

# **Exhibit 5**

**BROCK OHLSON**  
**INJURY LAWYERS**  
6060 ELTON AVENUE  
LAS VEGAS, NV 89107  
702.982.0055 PHONE  
702.982.0150 FAX

July 12, 2018

VIA Electronic Mail: [Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

Mr. Michael R. Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

To Whom It May Concern:

I represent Erin DeRusha in connection with the October 1<sup>st</sup> incident. Please direct all future correspondence or communication to my office.

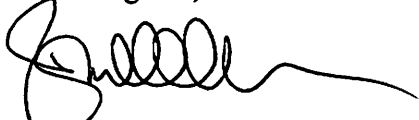
It should go without saying, all evidence must be preserved. Any destruction of any evidence will be viewed as spoliation of the same.

It is anticipated the combined claims will become the subject of a multi-claimant resolution process. Please advise as to all particulars once the process of determining a particular claims value commences.

Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should not contact my clients by mail (postal or electronic), phone, or otherwise.

Thank you for your anticipated cooperation in this matter.

Best regards,



Brock Ohlson

BKO/ms

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BROCK OHLSON, ESQ.<sup>ΔΩ∞</sup>  
IAN MCMENEMY, ESQ.<sup>Δ</sup>

<sup>Δ</sup>ADMITTED IN NEVADA  
<sup>Ω</sup>ADMITTED IN CALIFORNIA  
<sup>∞</sup>ADMITTED IN ARIZONA

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350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

To Whom It May Concern:

I represent Megan Kearney in connection with the October 1<sup>st</sup> incident. Please direct all future correspondence or communication to my office.

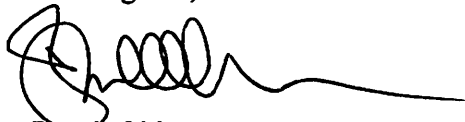
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Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should not contact my clients by mail (postal or electronic), phone, or otherwise.

Thank you for your anticipated cooperation in this matter.

Best regards,



Brock Ohlson

BKO/ms

**BERNSTEIN & POISSON**

*Attorneys and Counselors at Law*

**320 S. Jones Boulevard**

**Las Vegas, Nevada 89107**

**TELEPHONE: (702) 256-4566 FACSIMILE: (702) 256-6280**

Jack G. Bernstein, Esq. †  
Scott L. Poisson, Esq. †‡  
Christopher D. Burk, Esq. ‡  
James "Jamie" H. Corcoran, Esq. ‡

Brian M. Boyer, Esq. ‡  
Sean J. Akari, Esq. ‡  
Erik A. Bromson, Esq.  
Jennifer Gastelum, Esq. ‡

† Also Licensed in Florida  
‡ Also Licensed in Arizona  
‡ Also Licensed in California

October 11, 2017

**Via Certified U.S. Mail**

7016 2070 0000 6567 0197

CSC Services of Nevada Inc.

Registered Agent for Mandalay Bay Hotel and Casino

2215-B Renaissance Drive

Las Vegas, NV 89119

**Re:           Our Client:           Mr. Leo Hairston**  
**Your Business:       Mandalay Bay Hotel and Casino**  
**Location Address: 3950 South Las Vegas Blvd.**  
**Date of Incident:   October 1, 2017**

Dear Sir or Madam:

Please be advised that the law office of Bernstein & Poisson represents Mr. Leo Hairston with regard to the injuries and damages that he sustained as a result of the incident which occurred on October 1, 2017 and was caused by the negligence of your facility.

Please cease any further communication with our client and direct any further communication to the attention of the undersigned.

**Demand is hereby made that you comply with your legal duty to preserve any and all evidence relating to the above-captioned matter.**

**Please preserve the following**

- 1. Any video of the fall (We will pay the cost of the CD/DVD for this)**
- 1. Any video of the subject area of the fall on the date of the fall for 2 hours prior to the fall (We will pay the cost of the CD/DVD for this)**
- 2. Any video of the area of the fall area for 1 hour after the fall (We will pay the cost of the CD/DVD for this)**
- 3. Any photographs of our client or the fall area on the date of the fall.**
- 4. The names, phone numbers, addresses of any witnesses or employees of the subject fall.**



5. The names, phone numbers, addresses of any employees who spoke to our client after the fall as well as anyone who investigated the claim after the fall.
6. Sweep sheets/logs (or proof of sweeps) on the date of the incident.
7. Any receipts, invoices, bills, proof of payment or documents for repair to the area of the fall for 12 months before the fall to the date this letter is received.
8. Any emails between any employee, manager or claims adjuster (including TPA administrators) regarding this claim.

Demand is hereby made that you comply with your legal duty to preserve any and all evidence relating to the above-captioned matter. In compliance with your duty to preserve evidence, please ensure that **ANY AND ALL VIDEO surveillance tapes, maintenance records and sweep logs** pertaining to the date in question remain completely undisturbed. Additionally, demand is hereby made that you preserve all documentary and physical evidence relating to past, present and future inspections of the subject premises.

We respectfully direct your attention to Nevada Revised Statute 199.220 (destroying evidence), which provides criminal penalties for failing to preserve evidence. The statute provides in relevant part:

"[e]very person who, . . . with intent to delay or hinder the administration of the law or to prevent the production thereof at any time, in any court or before any officer, tribunal, judge or magistrate, shall **willfully destroy, alter, erase, obliterate or conceal any book, paper, record, writing, instrument or thing shall be guilty of a gross misdemeanor.**" *NRS 199.220 (emphasis added).*

Furthermore, Nevada Revised Statute 47.250 provides that a court of law will presume destroyed evidence would have been adverse if it had been preserved and produced as required by law. (*See NRS 47.250.*) There are counterpart provisions of Nevada law which provide that the adverse party's attorney shall not counsel or assist his client to unlawfully alter, destroy or conceal a document **or other material having potential evidentiary value** (*See RPC 173*). Additionally, Nevada law affords numerous other remedies available to the injured party. (*See, e.g., Stubli v. Big D. Intern Trucks*, 107 Nev. 309; *Young v. Johnny Ribeiro Building, Inc*, 787 P.2d 777; *Reingold v. Wet 'n Wild Nevada, Inc*, 944 P.2d 800). See also *Fire Insurance Exchange v. Zenith Radio Corp*, wherein the Nevada Supreme Court relevantly stated:

"[E]ven where an action has not been commenced and there is only a potential for litigation, **the litigant is under a duty to preserve evidence which it knows or reasonably should know is relevant to the action.**" *103 Nev. 648 (1987) (emphasis added).*

**We trust you will ensure that the subject surveillance tapes, maintenance records and sweep logs remain undisturbed until we may have the opportunity to review them.**

Page 3 of 3

Please call our office at the above-referenced number, so that we may schedule a mutually convenient time for review of the surveillance tapes, maintenance records and sweep logs in question. We cannot stress how important is for you to preserve any and all video evidence in this matter. Also, please send us the incident report related to this claim.

Thank you in advance for your professional courtesy.

Sincerely,  
**BERNSTEIN & POISSON**



Jevahanna L. Tijerina,  
Legal Assistant

JLT/j

Law Offices

*Nancy E. Lucianna, P.C.*

A Professional Corporation

Nancy E. Lucianna, Esq.

Member of N.Y., N.J. and U.S. Virgin Islands Bars

(St. Thomas, St. Croix, St. John)

Sara H. Bernstein, Esq.

Member of N.Y., N.J. and MA. Bars

1638 Center Avenue  
Fort Lee, New Jersey 07024

(201) 947-6484

Facsimile (201) 947-3438

E-Mail: [Nlucianna@msn.com](mailto:Nlucianna@msn.com)

[www.luciannalaw.com](http://www.luciannalaw.com)

October 23, 2017

MGM Resorts International  
3600 Las Vegas Blvd. South  
Las Vegas, NV 89109  
ATTN: Legal Department

**Re: Valdo Panzera, Jr. and Megan Iannuzzi v. MGM Resorts International  
and Mandalay Corporation**

Dear Sir/Madam:

Please be advised that this firm represents Valdo Panzera, Jr. and Megan Iannuzzi with regards to the above matter. On or about October 1, 2017 Mr. Panzera and Ms. Iannuzzi were attendees at the Route 91 Harvest Festival, a three day music festival which took place at the Las Vegas Village. During the concert, Mr. Panzera and Ms. Iannuzzi were victims of the mass shooting which occurred as a result of your negligence.


Specifically, MGM Resorts International and/or Mandalay Corp. failed to maintain their premises in a reasonably safe condition including, but not limited to, failing to properly surveil the premises, failing to properly monitor the hotel, failing to provide a timely response or otherwise act upon shots fired, failing to take precautions against delivery of firearms to the hotel premises, failing to discover and/or take action on the installation of outside surveillance set up on the premises, failing to discover and/or respond to the breaking of windows, and failing to adequately train and supervise employees in responding to and/or discovery suspicious activity.

As a result of your negligence, Mr. Panzera and Ms. Iannuzzi have endured numerous injuries including, but not limited to, post-traumatic stress, anxiety, and extreme fright, and continue to expend large sums of money seeking medical treatment for their injuries.

I fully intend to institute on Mr. Panzera and Ms. Iannuzzi's behalf in order to compensate them for their damages. Upon receipt of this correspondence, kindly have your insurance carrier contact this office so that we may discuss this matter as soon as possible.

Thank you for your prompt attention to this matter.

Very truly yours,

  
\_\_\_\_\_  
NANCY E. LUCIANNA, ESQ.

# THE COCHRAN FIRM

M E M P H I S

ONE COMMERCE SQUARE • SUITE 1700

MEMPHIS, TENNESSEE 38103

TELEPHONE: (901) 523-1222 • FAX: (901) 523-1999

WWW.COCHRANFIRM.COM

November 20, 2017

15041  
Mandalay Bay Hotel  
3950 S. Las Vegas Blvd  
Las Vegas, NV 89119  
Attn: Manager

**RE: Tamika Abdallah**  
**DOA: 10/2/2017**

To Whom It May Concern:

This firm has been retained to represent the above client in a claim for damages against you resulting from an incident that occurred on the above-captioned date.

If you carry liability insurance, your insurance company should be contacted concerning this incident. **LACK OF NOTIFICATION TO YOUR INSURANCE COMPANY MAY RESULT IN PREJUDICE.** We would appreciate your completing and returning the attached Information Sheet immediately so that we may communicate directly with your insurance company thereby avoiding any prejudice or inconvenience to you.

If you do not have insurance, please contact this office as soon as possible.

Thank you for the information. A self-addressed envelope has been enclosed for your convenience in returning this information sheet to our office.

Sincerely,



Angela Payne  
*Case Manager for Bill M. Wade*

Enclosures

INFORMATION SHEET

Our Client: Tamika Abdallah (15041)

Date of Loss: 10/2/2017

1. Name and address of insurance company: \_\_\_\_\_

\_\_\_\_\_

2. Name of Insured: \_\_\_\_\_

\_\_\_\_\_

3. Your Policy Number: \_\_\_\_\_

\_\_\_\_\_

4. Effective Dates of Policy: \_\_\_\_\_

\_\_\_\_\_

5. Your Complete Name: \_\_\_\_\_

\_\_\_\_\_



**BENSON & BINGHAM**  
**ATTORNEYS AT LAW**

JOSEPH L. BENSON II, ESQ.  
BEN J. BINGHAM, ESQ.  
Israel P. Whitbeck, Esq. \*  
Lina Sadovnikaite, Esq.\*\*  
Dana P. Oswalt, Esq.  
Ida Ybarra, Esq.  
\* (ALSO LICENSED IN CA)  
\*\* (ALSO LICENSED IN OR)  
Phone: 702.382.9797  
Fax: 702.382.9798

November 22, 2017

Sent via U.S. Certified Mail

Mandalay Bay  
3950 Las Vegas Blvd. South  
Las Vegas, NV 89119

**Re: Incident occurring on October 1, 2017**

Dear Sir or Madam:

Please be advised that this office represents the interests of Jeffrey Bachman relative to the injuries he sustained as a result of the Route 91 shooting on October 1, 2017. You and anyone acting on your behalf are hereby instructed to make all further contacts concerning this matter through my office. You are not to attempt to contact Jeffrey Bachman or his medical providers directly in any manner other than through my office.

If you were covered by any type of insurance policy to protect you for this type of incident, I would request you turn this letter over to your insurance carrier or adjuster immediately. By doing so, they can take the necessary steps to protect your interests regarding this incident. Failure to comply with this request could result in a lawsuit being filed against you. If you were not personally covered by insurance to protect you for this incident, please contact my office to discuss this matter within **ten (10) days** from the date of this letter.

This letter is also to formally demand preservation of certain evidence relating to this incident. The destruction, alteration, or loss of any of the relevant evidence, may constitute spoliation under Nevada law and subject you to sanctions from the Court. See *Fire Insurance Exchange v. Zenith Radio Corporation*, 103 Nev. 648, 747 P.2d 911 (1987). Those potential sanctions include, but are not limited to, allowing a legal presumption that the evidence would have been harmful to your side of the case and helpful to my clients, exclusion of your expert witnesses at trial, a deemed admission by you of certain facts regarding liability, and up to, a deemed admission of liability.

It is requested that you maintain, preserve, and not modify or alter all potentially relevant evidence includes, but is not limited to, the following:

**Mailing Address - Summerlin** • 11441 Allerton Park Drive, Suite 100 • Las Vegas, NV 89135  
**Downtown** • 626 South 10th Street • Las Vegas, NV 89101  
**Henderson** • 9230 S. Eastern Avenue, Suite 155 • Las Vegas, NV 89123

*Mandalay Bay*

*Re: Incident occurring on October 1, 2017*

*November 22, 2017*

*Page 2*

1. Any and all statements and/or reports pertaining to the subject incident;
2. Any and all photographs, videotapes, recordings pertaining to the subject incident;
3. Any and all maintenance, repair, and cleaning records pertaining to the location where the subject incident occurred; and,
4. Any and all employee schedules/rosters pertaining to the date of the subject incident.

Please immediately forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter.

Thank you for your prompt attention to this matter. I look forward to hearing from your insurance carrier, if not yourself.

Very truly yours,  
**BENSON & BINGHAM**



Ida M. Ybarra, Esq.

IY/vr

206201

**Mailing Address - Summerlin** • 11441 Allerton Park Drive, Suite 100 • Las Vegas, NV 89135  
**Downtown** • 626 South 10th Street • Las Vegas, NV 89101  
**Henderson** • 9230 S. Eastern Avenue, Suite 155 • Las Vegas, NV 89123

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**INJURY LAWYERS**  
6060 ELTON AVENUE  
LAS VEGAS, NV 89107  
702.982.0055 PHONE  
702.982.0150 FAX

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BROCK OHLSON, ESQ. <sup>ΔΩ∞</sup>  
IAN MCMENEMY, ESQ. <sup>Δ</sup>

<sup>Δ</sup>ADMITTED IN NEVADA  
<sup>Ω</sup>ADMITTED IN CALIFORNIA  
<sup>∞</sup>ADMITTED IN ARIZONA

November 7, 2017

MGM Resorts International  
3600 S. Las Vegas Blvd.  
Las Vegas, NV 89109

Re: Claimant: Cody Coffe  
Date of Loss: October 1, 2017  
Claim No.: Unknown

To Whom It May Concern:

I represent Cody Coffe in connection with the October 1<sup>st</sup> incident. One-month post-shooting, he remains with over 50 bullet and other fragments in his body. Though he persists in his determination to return to as normal a life as possible, I am sure you will agree, Cody will never be the same neither physically, mentally, nor emotionally.

It should go without saying, all evidence must be preserved. Any destruction of any evidence will be viewed as spoliation of the same.

It is anticipated the combined claims will become the subject of a multi-claimant resolution process. Please advise as to all particulars once the process of determining a particular claims value commences.

Thank you for your cooperation.

Best regards,



Brock Ohlson

BKO/ms





Downtown L.A. Law Group, LLP  
3470 Wilshire Boulevard, Suite 634  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2775

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

October 24, 2017

SENT VIA E-MAIL – [kdavis@lv.mgmgrand.com](mailto:kdavis@lv.mgmgrand.com)

Tel.: 877-880-0880

Fax: 702-891-3146

RE: Our Client : Peter Merli; Armanda Merli; Isaac Xavier Orozco;  
Frances Ramirez; Eydie Doyle; Michelle Orozco;  
Josh Fabella; Victoria Fabella

Date of Loss : 10/01/2017

Dear Mrs. Davis,

This firm has been retained by the above client to pursue a bodily injury and property damage claim against your insured.

Pursuant to §2695.7 [Standards for Prompt Fair and Equitable Settlements § (b)], upon receiving proof of claim, every insurer shall immediately, but in no event more than forty (40) calendar days later, accept or deny the claim in whole or in part, and affirm or deny liability.

Please refrain from contacting our client, and refer all documents and correspondences to the attention of the undersigned. ALL PAYMENTS made to any individual, or entity regarding this accident, including but not limited to bodily injury or med pay, must bear our name as co-payee as we do maintain a lien on this claim. This does not apply to property damage.

**THIS IS A FORMAL REQUEST FOR IMMEDIATE WRITTEN DISCLOSURE OF YOUR INSURED'S POLICY LIMITS. Please submit, in writing, your insured's policy limits to my office immediately upon availability.**

It is requested that you contact this office at your earliest convenience to discuss this matter further.

Very truly yours,  
Downtown L.A. Law Group

A handwritten signature in black ink, appearing to read 'Amy Gomez'.

Amy Gomez  
Case Manager

October 24, 2017

SENT VIA EMAIL - kdavis@lv.mgmgrand.com

Tel.: 877-880-0880

Fax: 702-891-3146

**RE: PRESERVATION OF EVIDENCE**

**Our Client :** Peter Merli; Armanda Merli; Isaac Xavier Orozco;  
Frances Ramirez; Eydie Doyle; Michelle Orozco;  
Josh Fabella; Victoria Fabella

**Date of Loss :** 10/01/2017

Dear Mrs. Davis,

Please be advised that this office represents the above clients for the injuries suffered at the hands of MGM Grand. Please have all of your representatives direct all correspondences regarding this incident to this office directly. Neither you nor anyone on your behalf has permission to speak to our client regarding this case.

We hereby formally request that you preserve all evidence in this case. Do not modify, alter or destroy any documents, images, recordings, or data that relates to this case. Do not permit anyone to modify, alter or destroy any such items. As the California Supreme Court has stated: "Destroying evidence can destroy fairness and justice, for it increases the risk of an erroneous decision on the merits of the underlying cause of action. Destroying evidence can also increase the costs of litigation as parties attempt to reconstruct the destroyed evidence or to develop other evidence, which may be less accessible, less persuasive, or both." *Cedars-Sinai Medical Center v. Superior Court* (1998) 18 Cal.4th 1, 8.

Please be advised that your failure to preserve the items will result in extremely unfavorable consequences to you. Indeed, be advised that we intend to seek remedies against you if you allow crucial evidence in this case to be modified, altered or destroyed. For instance, chief among these is the evidentiary inference that evidence which one party has destroyed or rendered unavailable was unfavorable to that party. *Id.* at 11; *Evidence Code* § 413. As presently set forth in *Evidence Code* § 413, this inference is as follows: "In determining what inferences to draw from the evidence or facts in the case against a party, the trier of fact may consider, among other things, the party's ... willful suppression of evidence relating thereto...." The standard California jury instructions include an instruction on this inference as well: "If you find that a party willfully suppressed evidence in order to prevent its being presented in this trial, you may consider that fact in determining what inferences to draw from the evidence." (BAJI No. 2.03 (8th ed.1994). *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 12.

In addition to the evidentiary inference, our discovery laws provide a broad range of sanctions for conduct that amounts to a "[misuse] of the discovery process." *Code of Civil Procedure* § 2023. Destroying evidence in response to a discovery request after litigation has

commenced would surely be a misuse of discovery within the meaning of § 2023, as would such destruction in anticipation of a discovery request. *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 12 (Emphasis added). The sanctions under *Code of Civil Procedure* § 2023 are potent. They include monetary sanctions, contempt sanctions, issue sanctions ordering that designated facts be taken as established or precluding the offending party from supporting or opposing designated claims or defenses, evidence sanctions prohibiting the offending party from introducing designated matters into evidence, and terminating sanctions that include striking part or all of the pleadings, dismissing part or all of the action, or granting a default judgment against the offending party. *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 12.

Additionally, lawyers are subject to discipline, including suspension and disbarment, for participating in the suppression or destruction of evidence. *Business & Professions Code* § 6106 ["The commission of any act involving moral turpitude, dishonesty or corruption ... constitutes a cause for disbarment or suspension."]; *Rules Professional Conduct*, Rule 5-220 ["A member shall not suppress any evidence that the member or the member's client has a legal obligation to reveal or to produce."].) The purposeful destruction of evidence by a client while represented by a lawyer may raise suspicions that the lawyer participated as well. Even if these suspicions are incorrect, a prudent lawyer will wish to avoid them and the burden of disciplinary proceedings to which they may give rise and will take affirmative steps to preserve and safeguard relevant evidence. *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 13.

Finally, *Penal Code* § 135 creates criminal penalties for spoliation. "Every person who, knowing that any book, paper, record, instrument in writing, or other matter or thing, is about to be produced in evidence upon any trial, inquiry, or investigation whatever, authorized by law, willfully destroys or conceals the same, with intent thereby to prevent it from being produced, is guilty of a misdemeanor." *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 13.

Accordingly, please advise us immediately of the status of any such evidence and your intentions with respect to its preservation.

#### **Other Documents and ESI Evidence**

You are hereby given further notice to immediately take all steps necessary to prevent the destruction, loss, concealment, or alternation of any paper, document, or electronically stored information ("ESI") and other data or information generated by and/or stored on your computers and storage media (e.g. hard disks, floppy disks, backup tapes, etc.), and emails related to this incident.

You should anticipate that much of the information subject to disclosure and responsive to discovery in this action is stored on your current or former computer systems and other media and devices (including personal digital or data assistants, voice-messaging or voice-mail systems, online repositories, and cell phones).

ESI should be afforded the broadest possible definition and includes, but is not limited to, all digital communications (e.g., e-mail, voice mail, instant messaging), word processed documents (e.g. Word and WordPerfect documents and drafts), spreadsheets and tables (e.g. Excel and Lotus 123 worksheets), accounting application data (such as QuickBooks, Money, or Peachtree), image and facsimile files (including PDF, TIFF, JPG, and GIF images), sound recordings (including WAV and MP3 files), video recordings, all databases, all contact and relationship management data, calendar and diary application data, online access data (including temporary, internet files, History, and Cookies), all presentations (including PowerPoint and Corel), all network access and server activity logs, all data created with the use of any Personal Data Assistant (PDA) such as Palm Pilot, HP Jornada, Cassiopeia, or other Windows-based or Pocket PC devices, all CAD files, and all back-up and archival files.

Adequate preservation of ESI requires more than simply refraining from efforts to destroy or dispose of such evidence. You must also intervene to prevent loss due to routine operations and employ proper techniques to safeguard all such evidence.

Because hard copies do not preserve electronic searchability or metadata, they are not an adequate substitute for ESI. If information exists in both electronic and paper form, you should preserve them both.

### **LITIGATION HOLD**

You are requested to immediately initiate a litigation hold for potentially relevant ESI, documents, and tangible things, and to act diligently and in good faith to secure and audit compliance with that litigation hold. You are also requested to preserve and not destroy all passwords, decryption procedures (including, if necessary, the software to decrypt the files), network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction software, and any and all other information and things necessary to access, view, and (if necessary) reconstruct any ESI. You should not pack, compress, purge, or dispose of any file or any part thereof.

You are further requested to immediately identify and modify or suspend features of your operations, information systems, and devices that, in routine operations, operate to cause the loss of documents, tangible items, or ESI. Examples of such features and operations include, but are not limited to, purging the contents of e-mail repositories by age, capacity, or other criteria; using data or media wiping, disposal, erasure, or encryption utilities or devices; overwriting, erasing, destroying, or discarding back-up media; re-assigning, re-imaging or disposing of systems, servers, devices, or media; running antivirus or other programs that alter metadata; using metadata stripper utilities; and destroying documents or any ESI by age or other criteria.

### **SERVERS**

With respect to servers like those used to manage electronic mail and network storage, the entire contents of each user's network share and e-mail account should be preserved and not modified.

### **STORAGE**

With respect to on-line storage and/or direct access storage devices attached to your mainframe computers and/or minicomputers, in addition to the above, you are not to modify or delete any ESI, "deleted" files, and/or file fragments existing on the date of this letter's delivery that contain potentially relevant information.

With regard to all electronic media used for off-line storage, including magnetic tapes and cartridges, optical media, electronic media, and other media or combinations of media containing potentially relevant information, you are requested to stop any activity which may result in the loss of any ESI, including rotation, destruction, overwriting and erasure in whole or



in part. This request is intended to cover all media used for data or information storage in connection with your computer systems, including magnetic tapes and cartridges, magneto-optical disks, floppy diskettes, and all other media, whether used with personal computers, minicomputers, mainframes or other computers, and whether containing backup and/or archival ESI.

### **PERSONAL COMPUTERS**

You should take immediate steps to preserve all ESI on all personal computers used by your officers, directors and employees, including all secretaries and assistants, that in any way relate to the [subject matter of action], and the events and causes of action described in the Complaint. As to fixed devices, (1) a true and correct copy is to be made of all such ESI, including all active files and completely restored versions of all deleted electronic files and file fragments; (2) full directory listings (including hidden files) for all directories and subdirectories (including hidden directories) on such fixed devices should be written; and (3) all such copies and listings are to be preserved until this litigation is ended. As to floppy diskettes, CDs, tapes, and other non-fixed media relating to this matter, they are to be collected and stored pending resolution of this litigation.

### **PORTABLE SYSTEMS**

In addition to your immediate preservation of ESI, documents and tangible items in your business, on servers and workstations, you should also determine if any home or portable systems may contain potentially relevant data or information. To the extent that officers, board members, or employees have sent or received potentially relevant e-mails or created or reviewed potentially relevant documents away from the office, you must preserve the contents of systems, devices, and media used for these purposes (including not only potentially relevant data from portable and home computers, but also from portable thumb drives, CD-R discs, PDAs, smart phones, voice mailboxes, or other forms of ESI storage). Additionally, if any employees, officers, or directors used online or browser-based e-mail accounts or services to send or receive potentially relevant messages and attachments, the contents of these account mailboxes should be preserved.

### **EVIDENCE CREATED OR ACQUIRED IN THE FUTURE**

With regard to documents, tangible things, and ESI that are created or come into your custody, possession, or control subsequent to the date of delivery of this letter, potentially relevant evidence is to be preserved. You should take all appropriate action to avoid destruction of potentially relevant evidence.

Please forward a copy of this letter to all persons and entities possessing or controlling potentially relevant evidence. Your obligation to preserve potentially relevant evidence is required by law.

**Very truly yours,  
Downtown L.A. Law Group**

A handwritten signature in black ink, appearing to read 'Amy Gomez', with a stylized flourish at the end.

**Amy Gomez  
Case Manager  
[Amy@downtownlalaw.com](mailto:Amy@downtownlalaw.com)**



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 960  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2775

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

All communications and correspondence are to be directed to the Downtown L.A. Law. The designation is pursuant to California Code of Regulations, 10 Chapter 5, Subchapter 8, Section 2695.2(c).

Date of Incident:

10/1/17

Michelle Orozco  
Signature

Today's Date:

10/13/17

Michelle Orozco  
Print Name



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 950  
Los Angeles, California 90010  
Phone: (213) 389-3763  
Facsimile: (877) 389-2775

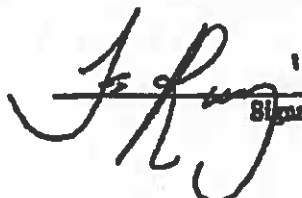
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## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

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Date of Incident: 10/1/17

  
Signature

Today's Date: 10/13/17

Frances Ramirez  
Print Name





Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 950  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2775

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## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

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Date of Incident: 10/1/17

  
\_\_\_\_\_  
Signature

Today's Date: 10/13/17

Eydie Doyle  
\_\_\_\_\_  
Print Name



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 980  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2778

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## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

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Date of Incident:

10/1/17

Isaac Orozco  
Signature

Today's Date:

10/13/17

Isaac Orozco  
Print Name

DocuSign Envelope ID: BEFFA86B-26B6-43AC-9E4-FEB918D814



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 950  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2775

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

All communications and correspondence are to be directed to the Downtown L.A. Law. The designation is pursuant to California Code of Regulations, 10 Chapter 5, Subchapter 8, Section 2695.2(c).

Date of Incident: 10/01/17

  
Signature

Today's Date: October 19, 2017

Victoria Fabella  
Print Name

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Los Angeles, California 90010  
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Facsimile: (877) 389-2775

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

## LETTER OF DESIGNATION

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

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Date of Incident: 10/01/17

Josh Fabella

Signature

Today's Date: October 19, 2017

Josh Fabella

Print Name

DocuSign Envelope ID: CFAF5ADF-E01A-4618-BC1-90CFB09452A



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 950  
Los Angeles, California 90010  
Phone: (213) 359-3766  
Facsimile: (577) 359-3770

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

All communications and correspondence are to be directed to the Downtown L.A. Law. The designation is pursuant to California Code of Regulations, 10 Chapter 5, Subchapter 8, Section 2695.2(c).

Date of Incident: 10/01/17

Peter Merli

Signature

Today's Date: October 20, 2017

Peter Merli

Print Name

DocuSign Envelope ID: D880A14C-750A-4DAB-843F-6176A1C1B9B6



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 950  
Los Angeles, California 90010  
Phone: (213) 389-3711  
Facsimile: (577) 369-2772

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

All communications and correspondence are to be directed to the Downtown L.A. Law. The designation is pursuant to California Code of Regulations, 10 Chapter 5, Subchapter 8, Section 2695.2(c).

Date of Incident: 10/01/2017

Amanda Merli

Signature

Today's Date: October 25, 2017

Amanda Merli

Print Name



*April 12, 2018*

***VIA EMAIL AND US MAIL***

Mr. Michael R. Doyen  
Munger, Tolles & Olson, LLP  
350 South Grand Ave., 50<sup>th</sup> Floor  
Los Angeles, CA 90071-3426  
[Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

*RE: Las Vegas Shooting Matter; Notice of Representation of Clients Directed to MGM Resorts International, Inc., Mandalay Corporation, All Counsel of Record, Any Litigation Associated Entities and All Entities Related to MGM Resorts International, Inc. and Mandalay Corporation.*

Dear Mr. Doyen:

I am writing on behalf of clients represented by Chad Pinkerton (The Pinkerton Law Firm) and Mo Aziz (Abraham Watkins) in the Las Vegas Shooting Matter. Please be advised that the individuals listed in *Exhibit A* are represented by **THE PINKERTON LAW FIRM, PLLC** and **ABRAHAM WATKINS**. *Exhibit A* is attached hereto. We respectfully request that all future correspondence or communications regarding the individuals listed in *Exhibit A* be directed to the following:

The Pinkerton Law Firm, PLLC  
Chad Pinkerton, Principle  
5020 Montrose Blvd., Suite 550  
Houston, Texas 77055  
[cpinkerton@chadpinkerton.com](mailto:cpinkerton@chadpinkerton.com)

Abraham Watkins  
Mo Aziz, Partner  
800 Commerce St.  
Houston, Texas 77002  
[maziz@abrahamwatkins.com](mailto:maziz@abrahamwatkins.com)

It has come to our attention that MGM Resorts International, Inc, Mandalay Corporation, and/or its associated entities, by and through counsel, have contacted and/or have attempted to contact clients represented by **THE PINKERTON LAW FIRM, PLLC** and **ABRAHAM WATKINS**. Effective immediately MGM Resorts International, Inc., Mandalay Corporation, all counsel of record, any litigation associated entities and all entities related to MGM Resorts International, Inc. and Mandalay Corporation are hereby instructed to cease any further contact with our clients, whether such contact be via mail, email, social media, telephone, or otherwise.

Should any of the individuals listed in *Exhibit A* been contacted, please provide a list of such individuals within fifteen (15) days. My understanding is that settlement offers have been made and possibly releases executed. Please provide that information also within the same fifteen (15) day period.

Thank you for your timely consideration of this matter. We look forward to working with you in the future. Should you have any questions, please do not hesitate to contact us. As always, I remain,

Very truly yours,



Chad Pinkerton

cc: Mo Aziz



**EXHIBIT "A"**

No.	CLIENT
1	Essence Abner
2	Quintivia Abner
3	Mark Abraham
4	Carlos Acosta
5	Zelda Adame
6	Cherie Jean Adams
7	Emmanuel Affran
8	Allen Afshari
9	Khaled Ahmed
10	Ysa Albert
11	Aliana Aleman
12	Javier Aleman
13	Dionndra Alexander
14	Ernesto Alfaro
15	Tenesha Alfaro
16	Sara Allegro
17	Africa Allen
18	Demtrius Allen
19	Etta Allen
20	Sarah Allen
21	Tony D. Allen
22	Nadia Allie
23	Ruben Alulema
24	Daniel Earl Alvarez
25	Lindsey Alvarez
26	Leslie Alworth
27	Danielle Ambrose
28	Cecil Anderson
29	Davis Anderson
30	Frank Michael Anderson, III
31	Gwendolyn Anderson
32	Jayon Anderson
33	Rebecca Ann Anderson
34	Ryan Anderson
35	Cassidy Andreason
36	Constantino Angeletakis
37	Christine Antonio
38	Robert Archambeault
39	Cassie Ardito
40	Richard Ardito
41	Jennifer Arellanes
42	Jose Andres Arevalo
43	Enrique Argueta
44	Melissa Arroyo
45	Kristine Arutunyan
46	Billy Ashley



47	Jeffrey Ashmore
48	Jesus Astua
49	Imari Ausbie
50	Veronica Avalos
51	Tina Marie Avery
52	Lisa Awalt
53	Andrew Ayala
54	Christopher Badorek
55	Ashle Bailey
56	Steven Bailey
57	Tracey Baker
58	Cole Baldwin
59	Wendy Baldwin
60	Tiffany Ball
61	Lonnie Banks
62	Terrance Banks
63	Diane I Banks-Mohr
64	Mary Banta
65	Ted Banta
66	Mark Baquedano
67	Melanie Barber
68	Debra A. Barchard
69	Audrey Bareham
70	Noel Barnes
71	Preston Barnes III
72	Tinella Barranco
73	Melissa J. Barren
74	Ronald A Barreras Jr
75	Donovan Barthel
76	Monique D Barthel
77	Lacey Bartko
78	Kyle Basom
79	Jesse Bateman
80	Christopher Thomas Battaglia
81	Kimberley Dawn Battaglia
82	Christopher M. Bauer
83	Robert Alton Beaird
84	Brandy Beaver
85	Aleisa Bebee
86	Brandon Charles Beckett
87	Veronica Beckwith
88	Sean Beeson
89	Antonyo Bell
90	Jasmine Bell
91	Jonathon Bell
92	Chico Belser
93	Kolter Raymond Beneitone

94	Cardell Benson Jr.
95	Damaen Bentley
96	Christi Beran
97	Babu Bhuiyan
98	Courtland Bibbs
99	Jennifer L. Bithell
100	Joshua Bitrich
101	Mindy Bitrich
102	Jason Black
103	Taylor Blaiser
104	Jodi Boatwood
105	Lisa Boissiere-Wright
106	Socorro Bolanos
107	Franchelle Bolden
108	Crystal Bolke
109	Nenad Bolta
110	Dianella Bono
111	Maureen Bonte
112	Paul Boone
113	Joe Botzoc
114	Ed Boucher
115	Aaron Bouphapraseuth
116	Rocky Boustani
117	Kayla Bowen
118	Swatavia Bowles
119	Fillise Boykin
120	Tamara Boykin
121	Tia Boykin
122	Rose Mary Bradley
123	Joshua Brady
124	Lauren Brady
125	Mike Brady
126	Scott Brady
127	David Brake
128	Edwinna Brame
129	Janicey Brar
130	Emily Brasfield
131	Robert J. Brickman II
132	Chandra Bridges
133	Kara Brien
134	James Brightly
135	Mailys Brightly
136	Bill Bringold
137	Craig Alan Brockett
138	Debbie Brockett
139	Kali Brockett
140	Lexia Brockett

141	Nicholas Bronas
142	Sylvia Lynn Brooks
143	Tina Brooks
144	Dylan Brown
145	Edward Brown
146	Florice Brown
147	Gregory Brown
148	James Brown
149	James Brown
150	Laquana Brown
151	Mandy M Brown
152	Michael Brown
153	Ronald Brown
154	Ronda Brown
155	Stephanie Brown
156	Tarik Brown
157	Brett Bruckner
158	Richard Bruins
159	Celia Brunghurst
160	Elijah Brunghurst
161	Jayceon Brunghurst
162	Casey Victor Bruns
163	Julie Bryan
164	Andre Bryant
165	Regina Bul
166	Treanisha LaShonda Bullion
167	David Lynn Bunch
168	Walter Burch
169	Kayla Burdo
170	Tara Burfield
171	Geroge Burgard
172	Ozarrlo Buri
173	Terry Burk
174	Zachary Burkes
175	Anthony Burns
176	Shanna Burrell
177	Andrea Bustamante
178	Gabriella Bustamante
179	Hector Caballero
180	Samuel Cabasag
181	Andretti Cage
182	Russell Cahoy
183	Heather L Cain
184	Nicholas Joseph Cain-Casey
185	Veronica Caldwell
186	Hunter Calef
187	Debra Calton

188	Robert Calton
189	Jennifer Campas
190	Julia Campos
191	Robert Candelaria
192	Ingrid Canelo
193	Renee Canelo
194	Mary Canich
195	Javier Cantu
196	Deborah Carelock
197	Janice Carone-Howard
198	Shamina Carpenter
199	Alexander Carriaga
200	Kimberly Carriaga
201	Deonna Carter
202	Earlilitra Danielle Carter
203	Ian Carter
204	Pearlina Carter
205	Michelle Ann Cashman
206	Jerry Castillo
207	Marissa Castle
208	Rebecca Castro
209	Angela Catura
210	Anthony Cavallaro
211	Constantino Cerrano
212	Karmen Chanasyk
213	Tequela Chappell
214	Savanna Chasco
215	Anjenette Cheney
216	Penny Chenier
217	Daniel Chlebowski
218	Susan Elizabeth Choulkes
219	Diane Christian
220	Ashley Bernard Christmas
221	Kenneth Christopher
222	Fabiola Cintron
223	Roger Cintron
224	Gloria Clark
225	Grace Claros
226	Alisa Clawson
227	Alicia Clayborn
228	Kara Clement
229	Daniel Cortes
230	James Cluck
231	Sharon Cluck
232	Danny Cluff
233	Kelvin H. Coachman
234	Donna Cochrane

235	Dawn Coe
236	Nick Colaizzi Sr
237	Leonard Colbert
238	David Cole
239	Dennis Neal Coleman
240	Kimberly Collins
241	Rashawn Collins
242	Jermaine Colquitt
243	Ronaldo Concepcion
244	Melissa Contri
245	Patricia Cook
246	William Cook
247	Glen Coonfield
248	Marguerite Cooper
249	Dennis Copeland
250	Diana Corradi
251	Jesse Cortez
252	Lisa Cortez
253	Ashley Jordan Corum
254	Douglas Corum
255	Brett Cossairt
256	Teresa Cote
257	Mia Cox
258	Teri Craney
259	Brittani Crawford
260	Stephen Crawford
261	Robin Creagh
262	Justin Cregar
263	Anthony Crespin
264	Jasper Cross
265	Kira M. Cross
266	Mandi Crowder
267	John W. Crowe Jr
268	Joy M. Cruz
269	Raymond Cruz
270	Tiffany Cundiff
271	Calli Dee Curry
272	Rutia Curry
273	Tammy Curtis
274	Nicole Cusick
275	Robert Cusick
276	Kinga Dajbukat
277	Kimberly Dale
278	Justin Damo
279	Jacqueline Daniels
280	Latief Daniels
281	Lisa Marie Daniels

282	Marcelene Darden
283	Juanitta Darlynn
284	Pritesh Davda
285	Walter D. Davenport
286	Antonio Davis
287	Carletta Davis
288	Diane Davis
289	Ellen Davis
290	Glen Davis
291	Nicole Davis
292	Patrese Davis
293	Quintin Davis
294	Rainna Rusk Davis
295	Tricia Davis
296	Deborah Dawkins
297	Deanna Dawson
298	Lori Dawson
299	Kelsey Day
300	Nolan Ryan Day
301	Thomas Day o/b/o Thomas Day, Jr.
302	Whitney Day
303	John Deane
304	Cynthia Dearing
305	Rachel DelaPaz
306	Amy Delaplane
307	Alejandra DeLaRosa
308	Daniel Delarosa
309	Rodrigo Delatorre
310	Chris Delaunay
311	Kortney Delaway
312	Michael Delcid
313	Adrian Delgado
314	Larry Delgado
315	Michael Dempsey
316	Tomas Dennehy
317	Hailey Dequillettes
318	Brian Desautels
319	Amy S. Desroches
320	Matthew Desroches
321	Alfred Devault
322	James Raymond Devoll
323	Mikaela Diaz
324	Cleveland Dickerson
325	Randy Dieter
326	James Dillard
327	Juanita Dillard
328	Katrina Dimacali

329	Linda DiNola
330	Laura Dixon
331	David Dogan
332	Daniel Dominguez
333	Hannah Dominguez
334	Linda Donahue
335	Heather E. Donat
336	Karin Donis
337	Liliana Donis
338	Kyle L. Donner
339	Allison Dorr
340	Jomont Dotton
341	Jaquashia Douglas
342	Sandra Douglas
343	Chad Dover
344	Billy W. Downing
345	Matthew Drew
346	Laureen Dright
347	Monique Jean Dumas
348	Paul Richard Dumas
349	Claro Duque
350	Amber Durham
351	Myron Dye
352	Hugh Joseph Dyer III
353	Michael Dyer
354	Cynthia Eaglin
355	Arthur T. Earl
356	Chris Eastman
357	Jennifer Eckmann
358	Jessica Edmondson
359	Calvin Edwards
360	La Star Edwards
361	Natalie Edwards
362	Rebecca Edwards
363	Theresa Ellis
364	Madelyn Enochs
365	Candice Erickson
366	Chris Erickson
367	Kandis Erickson
368	Sabrina Esparza
369	Soraya M. Espinoza
370	Lorena Esquibel
371	Sonya Esters
372	Keanu Edward Estrada
373	Laura Estrada
374	Nico Estrada
375	Roy Euwing

376	Briana Evans
377	Cynthia Evans
378	Dennis Evans
379	Michelle Evans
380	Peggy Evens
381	Kyle Evinger
382	Linda Faidell
383	Nancy Fairfield
384	Kristina Falco
385	Michelle Farias
386	Lourdes Farina
387	Laura Farthing
388	Angela Favia
389	Jeffrey Feig
390	Keliah Fell
391	Laughton Fell
392	Lori Fenner
393	Joshua Fenoglia
394	Nitisha Ferguson
395	Jennie Fernandes
396	Fiyeen Fien
397	Cassandra Figgers
398	Baylee Fincher
399	Brooke Fincher
400	Mindy Fincher
401	Amy Williams Fisher
402	Clarence Fisher
403	Judith Fisher
404	Laura Fiston
405	Susan Fitzgerald
406	Emily Flesher
407	Kristi Flesher
408	Kenneth Fletcher
409	Art Flores
410	Sharvonne Folmar
411	Evarick Ford
412	Donald Forsyth
413	Rochelle Forsyth
414	William Fountain
415	Gerald Fowler
416	Kadedra Fowler
417	Douglas Foye
418	Heidi Farnam
419	Robert Francis
420	David Franco
421	Aileen R. Franklyn
422	Lashea Frazier



423	Debbie Fredricksen
424	Kurt Fredricksen
425	Jazelle Frelo
426	Nicole Lynn French
427	Jeremy Frie
428	Brittany Friend
429	Cynthia Friske
430	Lorraine Fuentes
431	Imani S. Fuller
432	Zachary D Fulton
433	Derrick Gagliardi
434	Iyana Gaines
435	Inessa Galagan
436	Oleg Galagan
437	Michael Galasso
438	Erica Gallegos
439	Mandy Gallegos
440	Bridgett Galloway
441	William Galvez
442	Adrian Gamboa
443	Alfredo Garcia
444	Eric Garcia
445	Eugene Garcia
446	Frankie Garcia
447	Judith Garcia
448	Linda Garcia
449	Lisandra Garcia
450	Rosemary Garcia
451	Norma Garcia-Felix
452	Jose A Garduno
453	James Michael Garland
454	Oliver Garnica
455	Christy R Garza
456	Jose L. Garza
457	Brittany Gebhart
458	Keelon George
459	Paul George, Jr
460	William Georgia
461	Charmaine Germany
462	Thomas Geschrey
463	Garrett Ghahyasi
464	Selam Ghirmay
465	Meilin Gibbens
466	Courtney Gibson
467	Vernell Gibson
468	Beth Gifford
469	Michael Merced Gilardino

470	Stephen Giles
471	Atalie Gillison
472	John Gilmore
473	Damon Gipson
474	Chantel Rubio
475	Kylee Glasscock
476	Robert Glavis
477	Teresa Glavis
478	Del Golden
479	Keosha Goldman
480	Shaneca Goldman
481	Avery Goldston
482	Ashley Gomez
483	Debbie Ann Duran Gomez
484	Gilbert Gomez, Jr
485	Michelle Gomes
486	Jeffrey Alan Gonsalves
487	Andrea Gonzales
488	Daniel Joseph Gonzales
489	Jessie Gonzales
490	Tomas Gonzalez
491	Brittany Good
492	Natalie Bridges Goodrum
493	Tracy L. Gorman
494	Cheryl Grady
495	Margretta Graham
496	Keyatra Grant
497	Melvin Grant
498	Katrina Graves
499	Delores Gray
500	Jeanette Gray
501	Tawny Gray
502	Mario Grayson
503	James Green
504	Shirley Green
505	Kenneth Greenland
506	Kimberly Griffis
507	Greg Grimes
508	Jennifer Grimshaw
509	Rudy Guarino
510	Maria Guerra
511	Edward Guerrero
512	Mikerra Guerrero
513	Michelle Guerriero
514	Rocio Guillen
515	Matthew Guilo
516	Jesus Gutierrez

517	Joel D. Guzman
518	Trevor Hachey
519	Tryphena Renee Hachey
520	Crystal Hadley
521	Hiram Hairston
522	Devajae Hall
523	Martinez Hall
524	Travis Hall
525	Julian Hamilton
526	Cody Wayne Hansen
527	Matthew Hansen
528	Samantha Harb
529	Carol Harden
530	Brandon Harlow
531	Alicia Harmon
532	Brandy Harmon
533	Daisetta Harris
534	Derrick Harris
535	Lakhesha Harris
536	Latiesha Harris
537	Nikita Harris
538	Regina Anne Harris
539	Stacey Harris
540	Trino Harris
541	Lisa Hartz
542	Amir Hasan
543	Tara Hastings
544	Jennifer Haut
545	Melinda Hawkins
546	Kiley Hayden
547	Kristina Hayden
548	Tammy Lynn Hayden
549	Tracy Lyn Hayden
550	Cori Haynes
551	Zach Hays
552	Edward R. Hazen
553	Sean Healy
554	Justin Henderson
555	Porscha Henderson
556	Adalgisa Henning
557	Andrea Henning
558	Sumer Henning
559	William Henning
560	Justin Heredia
561	Richard Craig Hermann
562	Alberto Hernandez
563	Heather Hernandez

564	Rebecca Hernandez
565	Ricardo Hernandez
566	Mario Herrera
567	Shauntel Hibbitt
568	Emmitt Hickman
569	Donald Ray Hicks
570	Jerralynn Hicks
571	John Hicks
572	Shannon Hicks
573	Gary Hightower
574	Teresa Himley
575	Eboney Nicole Hines
576	Nathan Hinrichs
577	Abigail Hinton
578	Adriana Hinton
579	Alexis Hinton
580	Ambear Hinton
581	Rick Hinton
582	Lauren Hitt
583	Leigh Ann Hodgson
584	Marcella Hoffman
585	Steve Hoffmaster
586	Don Holbrook
587	Tanna Holderle
588	June Holdren
589	Christina J. Hole
590	Cindy Holguin
591	John Holladay
592	Rebecca Holland
593	Raven Holmes
594	Melissa Holmquist
595	Vanessa Holub
596	Alexis Hood
597	Taylor Hood
598	Lisa Hopkins
599	April Hopwood
600	Brittany Horton
601	Shaunte Horton
602	Abdirahman Hosain
603	Misty House
604	Cheri Lynn Howard
605	Khalfani Howard
606	Myesha Howard
607	Malisa Hoyme
608	Zerondrick Hubbard
609	Jamie Huddleston
610	Svetlana Huey

611	Martha Huezo
612	Joyce Humble
613	Shelley Hurtt-Mallory
614	Shahriar Irani
615	Sumoyyah Irving
616	Alicia Jackson
617	Anne Jackson
618	Devonta Jackson
619	Dmorea Jackson
620	Jessica Jackson
621	John Jackson
622	Leland Jackson
623	Austin Jaksha
624	Christopher Jaksha
625	Sophia Jaksha
626	Jaron Anthony Jamerson
627	Angelina James
628	Diana James
629	Namari January
630	Joanna Jashimoto
631	Chad Jeanotte
632	Aaron E. Jenkins
633	Jessica Ann Jenkins
634	John Jenkins
635	Kathryn Jennings
636	Sherwin St. John
637	Brandon Johnson
638	Corey Johnson
639	Darrell Johnson
640	Daviell Johnson
641	DeAndre Johnson
642	Derian Johnson
643	Jaynelle Johnson
644	Johanna Johnson
645	Josephine Johnson
646	LaNeshia Johnson
647	Larontae Johnson
648	Leviticus E. Johnson
649	Malvin Johnson
650	Monta Johnson
651	Porcha Johnson
652	Sarah Johnson
653	Tabia J. Johnson
654	Nkosi S. Johnson-Kimber
655	Alicia Johnston
656	Deborah Johnston
657	Nick Johnston

658	Renae Jolley
659	Pierre Jolly
660	Antoinette Jones
661	Beth Jones
662	Brent L. Jones
663	David Jones
664	Donnie Jones
665	Edgar T. Jones
666	Esther Jones
667	Gregory Jones
668	John Jones
669	Joniqueka Jones
670	Lannetta Jones
671	Lois Jones
672	Shaheed Jones
673	Thomas Jones
674	Jason Joseph
675	Chiquana Joshua
676	John Julias
677	Meagan L. Kaber
678	Clarice Kahia
679	Grace Kajimura
680	Myles Kalk
681	Michael Kaplish
682	Ron Katz
683	Waltkoya Kayzee
684	Sheila Keele
685	Scott Keeran
686	Valerie Melissa Keeran
687	Andrea Dawn Kelly
688	Joshua Kelly
689	Meachelle Kelly
690	Michael Kelly
691	Kyle Kennedy
692	Rachel Andrea De Kerf
693	Kelsi Kessler
694	Lisa Khader
695	Sana Khader
696	Mozzaffa Khogaly
697	Kevin James Killen
698	Tara Lee Killen
699	Joanna Kilma
700	Brenden C Kimber
701	Jawaundo W Kimmons
702	Beverly King
703	Geneva King
704	Shanta King

705	Tara King
706	Richard Kingery
707	Jennifer Kay Kinghorn
708	James Kirk
709	Judie Jean Kirksey
710	Nicole Kirshner
711	Cynthia Kitchens
712	Matthew Klemmer
713	Nikkole Knight
714	Angell Knittle
715	Kerri Knudson
716	Joseph Kocjan
717	Asmik Kotoyan
718	Jazman Glover Kowalczyk
719	Michael Kretschmar
720	David Kronberg
721	Lauren Christine Krueger
722	Mary Lynn Kueffner
723	Madisyn Kuntz
724	Scott T. Kuntz
725	Paula LaBorde
726	Billie Lacount
727	Ambriz Ladson
728	Bradley Kent Lagro
729	Brittany LaJoie
730	Michael Landron
731	Denise Lankford
732	Rob LaRash
733	Valerie LaRocque
734	Victoria Larranaga
735	Richard Larson
736	Quentin Lathan
737	Mark Lathen
738	Mario Latka
739	Michael Leahy
740	Chloe Lebo
741	Maxime Lecocq
742	Cara Ledergerber
743	Amiah Lee
744	Erika Lee
745	Lisa Lee
746	Mhonai Lee
747	Robert J. Lee
748	Kelly Lehmann
749	Tara Lem-mons
750	Nick Lemay
751	Alicia Leonard

752	Delanie Leone
753	Catherine Lester
754	Samuel Leuty
755	Albert Levy
756	Ashley Breanna Lewis
757	Felicia Lewis
758	Haley Lewis
759	Terrence Lewis
760	Charles Lexion
761	Kimberly Lilgreen
762	Ricky Limerick
763	Brent Gregory Little
764	Michelle N. Little
765	Carolyn Lizama
766	Yolanda Lizardo
767	Elvia Llamas
768	Manuel Llamas
769	Alexis Marie Llanusa
770	Delaney Llanusa
771	Brooklyn Taylor Llewelyn
772	Alicia Lochrie
773	Kimela Lockhart
774	Valarie Loera
775	Valarie Lofton
776	Alma Lopez
777	Eileen Lopez
778	Ricardo Lopez
779	Vicente Lopez
780	Lisa Loreda
781	Greg Loring
782	Kimberly Loring
783	Jahaira Losey
784	Zekiel Losey
785	Lafayette Love
786	Jeremy Lowery
787	Nicole Luciano
788	Joshua Luiz
789	Joy Lujan
790	Katie Lunde
791	Kayla Macias
792	Kimberly Macias
793	Moises Macias
794	Lynda Maddox
795	Daisy Madrigal
796	Cynthia Maevers
797	Raymond Magruder
798	Keri Maher



799	Claudia Majalca
800	Emily Majer
801	Vanessa Mallory
802	Albert Malone
803	Sheila Malone
804	William Maloney
805	John Malphrus
806	Eric Maltz
807	Jeff Manahan
808	Kaitlin Manahan
809	Kevin Manahan
810	William Manciano
811	Carolyn Manning
812	Lisa Manson
813	Shirley Manus
814	Austin Marcus
815	Manuel Marinez
816	Nicole Marino
817	Christian Marquez
818	Christopher Alan Marsh
819	Daniel Marshall
820	Dashaun Marshall
821	Traci Marshall
822	Zaqoia Marshall
823	Kenneth Martin
824	Michele Martin
825	Steve D. Martin
826	Andrew Martinez
827	Daniel Martinez
828	Elisa Martinez
829	Holy Angel Martinez
830	Kelly Martinez
831	Steven Martinez
832	Dustin Mascaro
833	William Mason
834	Richard Masucci
835	Lana Mathis
836	Jathan Matthews
837	Tanika Matthews
838	Monique Maxey
839	Jamie Maxwell
840	Anthony Mayshack
841	Theresa Mayshack
842	Moussa Mboup
843	Jeremiah McAfee
844	Steve McBee
845	Szilvia McBride

846	Karen McCorkle
847	Lonnie McCorvey
848	Kemmy McCoy
849	Jamonte McCullar
850	Shirley McCurry
851	Daniel McDonald
852	Sundae McDowell
853	Lori Anne McElroy
854	Lontisha McGilberry
855	Tamika McGill
856	Akariyanna McGlaun
857	Rashi Mcglaun
858	Sonya McGlaun
859	Morgan McGuiness
860	Lexi Ann McIntosh
861	Damien McIntyre
862	Tashara McMullen
863	Rajai J. McNeill
864	Christian McQuown
865	Jamie Medeiros
866	Jovannie Mediano
867	David Medina
868	Doreen Medina
869	Johnathan Daniel Medina
870	Kidada Medina
871	Laurel Meek
872	Christina Melgoza
873	Seana Melia
874	Rachelle Melocoton
875	Adrian Melville
876	Ileri Mendez-Alvarez
877	Jose Menendez
878	Raymond Merkley
879	Darren Merriweather
880	Sadat Merriwether
881	Joshua Meyer
882	Romeo Meyer
883	Genevieve Mazza
884	Vanessa Michels
885	Jarod Mielcarek
886	Erenia Mijangos
887	Jazmia Miller
888	Robert Miller
889	LeVelle Mills
890	Allen Mims
891	Rita Mims
892	Melissa Mina

893	Ashley Nicole Mireles
894	Alexandria Mitchell
895	Kimani Mitchell
896	Heather Chiyeko Miyakawa
897	Morgan Moeller
898	Lilianna Molina
899	Ruben Molina
900	Andon Monfreda
901	Lazaro Mont-Ros
902	Aunna Montgomery
903	Phyllyssa Montoya
904	Mehadi Moona
905	Alyssa Moore
906	Antoinette Moore
907	Belinda Moore
908	Dodi Moore
909	Kristi Moore
910	Lakesha Moore
911	Markeith Moore
912	Amelia B. Morales
913	Bambi Rene Moreau
914	Scott Moreau
915	Britnie L. Morgan
916	Candice Morgan
917	Samuel Morrell
918	Thomas Cameron Morrier
919	Evelyne Annette Morris
920	Jamie N. Morris
921	Shakiera Morris
922	Stephania Morris
923	Devonte-Amir Morrison
924	LaDarius Morrison
925	Venus Mosley
926	Denise Mraz
927	Jillian Mueller
928	Sean P. Mullaly
929	Jonathan Mulligan
930	Eddie Munoz
931	Esther Munoz
932	DeAngelo Murillo
933	Kevin Murphy
934	Maureen Murphy
935	DeAnne Murray
936	Ronald Murray
937	Tracy Murray
938	Macy Myers
939	Shancela Myers

940	Joan Myles
941	Nathaniel Myles
942	Mark Myszak
943	Marirose Naing
944	Joseph M. Napoli
945	Mohammad Nassar
946	Laura Natrop
947	Rick Neal
948	Gregory L. Nelson
949	Joanne Nelson
950	Robert Troy Nelson
951	Chayla Nepote
952	Summer Neria
953	Coral Nettles
954	Shui Ng
955	Sandy Nguyen
956	Phillip Nichols
957	Annetta Nicholson
958	Gregory Nix
959	Anthony Don E Noarbe
960	Cherie Noll
961	Linda Nooner
962	Amber Norcia
963	Yvonne Nordquist
964	David Norman
965	Lela Jean Norton
966	Toby Norwood
967	Jenna O'Neal
968	Rose O'Toole
969	Mfalme Odie
970	Elizabeth Okoro
971	Tiffany Okum
972	Cassie Suzanne Olander
973	Ila Oldham
974	Virginia Olen
975	Quincy Oliver
976	Cynthia Olvera
977	Donald Orlan
978	Claudia Oropeza
979	Annette Orozco
980	Noemi Orozco
981	Brenda Orr
982	Victor Orschel
983	Theresa Ortiz
984	Linda Osting
985	Kuulei Otis
986	Tawanya Otto

987	Robby Owens
988	Tanny Owens
989	Destiny Pacheco
990	Carlos Padilla
991	Bacarri Page
992	Leslie Lynn Paiz
993	Bonnie Palazzola
994	Jason Palmer
995	Melanie Palmer
996	James Palmieri
997	Naomi Pantiru
998	Louella Abad Parga
999	Chad Parisien
1000	Thomasina Parker
1001	Yvette Parker
1002	Bridget Parkington
1003	Brittney Parkington
1004	Alina Parrish
1005	Hubert Leonard Pascoe III
1006	Davon Patterson
1007	Michael Patterson II
1008	Kaycee Paul
1009	Kimberly Payton
1010	Masoud Pazouki
1011	Michelle Pearson
1012	John Peck
1013	Allie Rae Pelletier
1014	Shannon Pendergrass
1015	Elisa Perez
1016	Joaquin Perez
1017	Paul Perez
1018	Adrian Perkins
1019	Eric Perkins
1020	Jeffrey Perkins
1021	Angela Marie Perry
1022	Durwin Perry Jr
1023	Denine Peters
1024	Tobby Petersen
1025	Kathleen Jo Peterson
1026	Sharon Pettaway
1027	Danylle Peyton
1028	Lloyd Phillips
1029	Rosemary Phillips
1030	Brian Pickens
1031	Jeremy Pickett
1032	Stephen Pierce
1033	Joseph Pitzel

1034	Leonel M. Plata, Jr
1035	Jose Plaza
1036	Kari Plumb
1037	Jim Plummer
1038	Mackenzie Pluta
1039	Karlee Poe
1040	Gwendolyn Pointer
1041	Jeannetta Polite
1042	Tyresha Polk
1043	Antonio Ponciano
1044	Anthony Poore
1045	Tiffany Raecene Pope
1046	Brent Poppen
1047	Erica Susan Poppen
1048	Darrian Porter
1049	Myosha Porterie
1050	Beatrice Potter
1051	Joe Powell
1052	Keith Powers
1053	James Prentice Jr
1054	Michael Price
1055	Shawn Price
1056	Drake Pritchett
1057	Vorn Seal Radcliffe
1058	Rashida Raines
1059	Karmjit Raju
1060	Diego Armando Ramirez
1061	Ina Ramirez
1062	Krystal Ramirez
1063	Maria Ramirez
1064	Perla Ramirez
1065	Renee Ramirez
1066	Rommel Ramos
1067	Suelema Ramos
1068	Myra Randle
1069	Collearen Randolph
1070	Paulette Raphael
1071	David Rasmusson
1072	Michelle Rasmusson
1073	Sonrisa Rath
1074	Karen Ray
1075	Lance Ray
1076	Nick Redd
1077	Melissa Redwine
1078	Alala Reed
1079	Matthew C. Reed
1080	Eric J. Regnier

1081	Michael Thomas Reichard
1082	Katherine Renfro
1083	Gaila Requena
1084	Francisco Resendiz
1085	Garland Reyes
1086	Marion Reynolds
1087	Shelonda Rhodes
1088	Steven Ribovich
1089	Marie Rice
1090	Nelisha Richard
1091	Marcus Richardson
1092	Kimberly Richie
1093	Mike Richmeier
1094	Nathan Rios
1095	Israel Rivera
1096	Israel Rivera
1097	Levelle Rivers
1098	Jade Rixey
1099	Chamika Roberson
1100	Kurt Roberts
1101	LaKita Robins
1102	Dontae Laroi Robinson
1103	Leslie Robinson
1104	Margo Robinson
1105	Michael Robinson
1106	Milton Robinson III
1107	Terrell Robinson
1108	Michael Robles
1109	Josette Rocha
1110	Jennifer Rockwell
1111	Alaia Rodriguez
1112	Alfredo Rodriguez
1113	Angelita F. Rodriguez
1114	Aralyn Rodriguez
1115	Perla Rodriguez
1116	Ronald Rodriguez
1117	Sheri Rodriguez
1118	Zoe Rodriguez
1119	Jill Andrea Rogers
1120	Marcelina Rojas
1121	Tonia Roland
1122	Janeann Rollins
1123	Desiree Rondeau
1124	Guadalupe Aguilar Rose
1125	Susan Rose
1126	Antawn Ross
1127	Tirrelle Ross

1128	Allan Rousseau
1129	Dixie Roybal o/b/o Christopher Roybal
1130	Lisa Rudberg
1131	Lucia Rudela
1132	Shirley Ruelas
1133	Anthony Rufo
1134	Laura Ruiz
1135	Paul Rutherford
1136	Theresa Ryan
1137	Michael Coty Rye
1138	Roni Rymer
1139	Rebecca Sadowsky
1140	Allison Saelee
1141	Steve Sagely
1142	Britney Salas
1143	Juan Salas
1144	Nicole Salas
1145	Destinee Salayandia
1146	Jasmine Salazar
1147	Nedal Salman
1148	Amanda Salmon
1149	Lisa Kim M. Sammons
1150	George Sanchez
1151	Jennifer Sanchez
1152	Jose Luis Sanchez
1153	Kelli Sanchez
1154	Marie Sanchez
1155	Savannah Sanchez
1156	Trevor Sanders
1157	Ernestine Sandoval
1158	Kim Sandstrom
1159	Princess Santos
1160	Ina Sarkissian
1161	Nela Sarkissian
1162	Joseph Sartin
1163	Melissa Saucedo
1164	Katree Saunders
1165	Jito Scales
1166	David Scantlin
1167	Michelle Scantlin
1168	Ryan L. Scantlin
1169	Janelle Scheidl
1170	Magen Schiermbock
1171	Alice Schmidt
1172	Laura Schneiber-Bruns
1173	Lisa Schneider
1174	Mark Schneider



1175	Michelle Schoneman
1176	Gloria J. Schryver
1177	Kishawna Scott
1178	Michael Scott
1179	Roderick Rico Scott
1180	Charles Scruggs
1181	Magee Segal
1182	Cheryl Seguin
1183	Fred Seguin
1184	Tina Sellars
1185	Cole Seymour
1186	Amir Shaterian
1187	Alison Sheehe
1188	David Sheriff
1189	Jerome Sherrod
1190	Remo Sheth
1191	Michael K. Sholan
1192	Ebony Sholes
1193	Robert Shrode
1194	Christopher Shuemaker
1195	Jeffrey Shull
1196	Tamala Siegel
1197	Anthony Silva
1198	Johanna Simeon
1199	Owen Simmons
1200	Rhasaan Simmons
1201	Cheyenne Nicole Simon
1202	Griselda Simons
1203	Ronald Simons
1204	Marie Simpkins
1205	Cheston Skenandore
1206	Buddy Skidmore
1207	James Lee Skinner Jr
1208	Shelby Slifka
1209	Karen Elaine Smerber
1210	Amber Smith
1211	Calvin Smith
1212	Dana L. Smith
1213	Destinee Smith
1214	Fleming Smith III
1215	Imelda Smith
1216	Iyuna Smith
1217	Jasper Smith
1218	Joaneka Smith
1219	Jolanda Smith
1220	Kimberly Ann Smith
1221	Kristi Smith

1222	Levonne Smith
1223	Raekwon Smith
1224	Ruth Smith
1225	Ryan Smith
1226	Ryan Oneil Smith
1227	Tina Smith
1228	Willie Smith
1229	Yvonne Smith
1230	Danielle Smudde
1231	Jerome Smullen
1232	Dan Socci
1233	Elizabeth Socci
1234	Lisa Soininen
1235	Daysi M. Solano
1236	Dolores Maria Solano
1237	Martin Solano
1238	Jeffrey Solberg
1239	Sabrina Solomon
1240	Karla Sorrosa
1241	Stephanie Sotomayor
1242	Katey Souza
1243	Pasquale Spano
1244	Ronika Spears
1245	Cheryl Spencer
1246	Keoscha E. Spencer
1247	Savannah Spencer
1248	Stephanie Spencer
1249	Suzanne Spencer
1250	David Spring
1251	Robert Stafford
1252	Leticia Marie Staggs
1253	Robert Staggs
1254	Michael Staley
1255	Danny Staples
1256	Harper Staples
1257	Kristina Staples
1258	Samuel Staples
1259	Jeffrey Steffens
1260	Kenneth Steward
1261	Chris Stewart
1262	Sharal Stewart
1263	Clarence Stockton
1264	Jacob Stoddard
1265	JoAnn Stoudemire
1266	Valerie Stout
1267	Dana Stout-Wilson
1268	Lindsay Stragier

1269	Amber Streid
1270	Michelle Stuebe
1271	Susanna Suard
1272	Vincent Sullivan
1273	Lisa Sulvetta
1274	Jack Summerlin
1275	Clint Sundeen
1276	Kellie Sundeen
1277	Kyle C. Sundeen
1278	Shawna Sutton
1279	Brandi Swan
1280	John Swayzer
1281	Lynnsey Sweet
1282	Larry Gordon Swift
1283	Erin Taber
1284	Shonte Talley
1285	Abraham Tanielian
1286	Jamie Tanner
1287	Graciela Tapia
1288	Gregory Tavernite
1289	Betty Taylor
1290	Brianna Taylor
1291	Gregory Taylor
1292	Jason Taylor
1293	John Taylor
1294	Kayla Taylor
1295	Lauren D. Taylor
1296	Sam Taylor
1297	Shawn Taylor
1298	Teresa Taylor
1299	Tiffany Taylor
1300	Wendy Taylor-Hill
1301	Kellie Tederman
1302	Treasure Tellis
1303	Desiree Temple
1304	Diane Tharpe
1305	Reginald Tharps
1306	David W. Theriault
1307	Breyana Thomas
1308	Christina Thomas
1309	David Thomas
1310	Deborah Thomas
1311	Jeffrey Thomas
1312	Karnesha Thomas
1313	Steven Thome
1314	Bailey Thompson
1315	Bridget Thompson

1316	Darralyn Thompson
1317	Keely Thompson
1318	Ruth Thompson
1319	Evan Tillema
1320	Alva Bruce Tilley
1321	Joshua Tinoco
1322	Lanna Tinoco
1323	Joseph Tobin
1324	Anna Todd
1325	Byanca Todd
1326	Richard Toffolla
1327	Juanita Toliver
1328	Kenneth Tonkovich
1329	Brenda Topete
1330	Rafael Torregano
1331	Michelle Torrente
1332	Quincy Torres
1333	Rosalia Torres
1334	Leotis Tramble
1335	Demetrius Trammel
1336	Emily Ann Trematerra
1337	Robert Trematerra
1338	Jordan E. Tremper
1339	Colin Trevino
1340	Jessica Troutman
1341	Edward Trovato
1342	Francesca Trujillo
1343	Isabella Trujillo
1344	Jacquelyn Trujillo
1345	Maryloc Trushel
1346	Beijing Tukes
1347	Kelli Turnbow
1348	Artrice Turner
1349	Jennifer A. Turner
1350	Tanisha Turner
1351	Joel Twycross
1352	Lisa Valdes
1353	Erin Valenzuela
1354	Nubia Valenzuela
1355	Sandra Valenzuela-Norris
1356	William F Vanderveer
1357	Gerard Vangerwen
1358	Nicole Vanyo
1359	Darline Varnsladson
1360	Ann'drea Vaughn
1361	Clayton Vaughn
1362	Frank Vealencis

1363	Tamara Vealencis
1364	Sandra Velasquez
1365	Margaret Ventresca
1366	Edgar Vicente
1367	Paige Vick
1368	Alma Delia Villa
1369	Regina Viola
1370	Jasmine Waddles
1371	Njeri Wade
1372	Cecelia Joya Walach
1373	Alyssa Walker
1374	Imelda Walker
1375	Kamia Walker
1376	Tylesha Walker
1377	Mioshi Wallace
1378	Nicole Walleck
1379	Lori Waller
1380	Mario Waller
1381	Penise Waller
1382	Quentin Waller
1383	Alex Walters
1384	Rebecca Waltman
1385	Margo Ward
1386	Odjessica Ward
1387	Alice Ware
1388	Donald Washbrook Jr.
1389	Tikiesha Wasp
1390	Daletha Waters
1391	Deneica Watkins
1392	Zahra Watkins
1393	Darnell S. Watts
1394	Brian John Weaver
1395	Nina Weaver
1396	Jerome Arthur Wegworth Jr
1397	Marcus Wellmaker
1398	Kevin Wells
1399	Donald Welty
1400	Juan Wesley
1401	Jimmie West
1402	Gina B. Wheeler
1403	Brandon White
1404	Brandy M. White
1405	Derek White
1406	Greg White
1407	Montee White
1408	Venetia White
1409	Victoria White

1410	Gladys Whitehurst
1411	Nicole Whitlock
1412	Presley Wick
1413	Annie Wiggins
1414	Tracie P. Wight
1415	Sean Wilcox
1416	Zachary Wilcox
1417	Chisca Wiley
1418	Jordan Wilkinson
1419	Alonzo Williams
1420	Andra C. Williams
1421	Brandi Williams
1422	Charles Williams
1423	Craig A. Williams
1424	Jeffery Williams
1425	Kenneth Williams
1426	Leon Williams
1427	Nanita Williams
1428	Noah Williams
1429	Pamela Williams
1430	Robert Williams
1431	Teracio Williams
1432	Teri Williams
1433	Julia Williams-Long
1434	L'Tanya Wilson
1435	Marcus Wilson
1436	Zabrina Wilson
1437	Donna Wilson-Demmon
1438	Katelyn Wing
1439	Kerry Wisden
1440	Gary "Opie" Allen Wise
1441	Tammy Wolfe
1442	Adrienne Woods
1443	Latricia Woods
1444	Mark Woods
1445	Nikki Woods
1446	Nishon Woods
1447	Andre Wyatt
1448	Charles V. Wynn
1449	Tome Xayavong
1450	Michael Yang
1451	Gerald Yeager
1452	Erica M. Yee
1453	John Yonts
1454	Bethany York
1455	Ashley Young
1456	Dominique Young

1457	Kenya R. Young
1458	Maya Young
1459	Roye Young
1460	Vassar D. Young
1461	Aaron Zackery
1462	Susan Zahler
1463	David Zamora
1464	Debra Zamora
1465	Jessica Lauren Zetterberg

December 22, 2017

VIA Electronic Mail  
Mr. Michael R. Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
[Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients  
to MGM Resorts International, Inc., Mandalay Corporation, and  
All Related Entities

Dear Mr. Doyen:

Please be advised that the individuals listed in Exhibit A attached hereto are represented by The Law Offices of A. Craig Eiland, P.C. and Lee Murphy Law Firm. As counselors for the claimants listed in Exhibit A, we request that all future correspondence or communications be directed to our attention at the following address:

A. Craig Eiland  
The Law Offices of A. Craig Eiland, PC  
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512.482.3260  
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Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should not contact our clients by mail (postal or electronic), phone, or otherwise. Thank you for your anticipated cooperation in this matter.

Sincerely yours,

  
A. Craig Eiland



**Notice of Representation - Exhibit A**

No.	Client Name
1	Abrams, Andrea
2	Abrams, Daniel
3	Adkins, Joe
4	Agosta III, Joseph
5	Agosta, Cynthia
6	Aguirre, Lillian
7	Ahlers, Hannah
8	Albertini, Marco
9	Altamirano, Leanne
10	Alvarez, Alex
11	Andrade-Kwist, Trina
12	Arce, Brenda
13	Balas, Joseph I.
14	Balas, Kendal S.
15	Balas, Macey N.
16	Balas, Shannon
17	Bangma, Martin
18	Barnette, Carrie
19	Belmares, Annalise
20	Belmares, Meghan
21	Berney, Karen
22	Best, Daniel R
23	Bobb, Amanda
24	Bontempo, Nicole
25	Bui, John
26	Campbell, Jennifer L.
27	Campbell, Lynzee
28	Campbell, Patricia
29	Cannon, Leticia
30	Carrillo, Matthew
31	Carvalho, Elizabeth A.
32	Case, Vanessa
33	Cass, Carley
34	Caywood, Christopher
35	Caywood, Kasandra
36	Cesario, Keri
37	Christensen, Kristi
38	Christensen, Randall "Randy"
39	Cigarroa, Manuel
40	Cluff, Greg
41	Corbin, Barry D.
42	Corbin, Dawni L.
43	Craig, Tyler
44	Crane, Brenda
45	Cresta, Anthony M.
46	Crisp, Evelyn

**Notice of Representation - Exhibit A**

<b>No.</b>	<b>Client Name</b>
47	Cuellar, Chanell
48	Cuellar, Juan
49	Currie, Marissa J.
50	David, Kyle
51	Dimitruk, Diana J.
52	DiRado-Moreno, Lisa
53	Donnelly, Sierra M.
54	Dubbs III, Duane
55	Duncan, Johanna L.
56	Duncan, Matthew P.
57	Elliott, Derrick
58	Elliott, Jillian
59	Ellis, Ali
60	Espinoza, Ernesto
61	Everett, Wendy
62	Fassinno, Charleen R
63	Feinberg, Evan
64	Feliciano, Rafael
65	Fields, Maryssa
66	Floen, Dave
67	Foltz, Marlana
68	Ford, Jason A.
69	Ford, Jessica M.
70	Foster, Mindy P.
71	Frost, Amanda
72	Gadd, Kevin
73	Gallegos, Stephanie
74	Garcia, Jesse
75	Garcia, Teresa
76	Gibson, Jennifer
77	Gilmore, Jimmy
78	Gonzales, Katherine L.
79	Gonzalez, Denise
80	Guerrero, Ashlie
81	Guerrero, Gabriel
82	Guerrero, Miguel
83	Guerrero, Trisha
84	Gurule, Jon C.
85	Gurule, Tammy M.
86	Guzman, Gabriela
87	Hansson, Michael
88	Hawkins, Melinda
89	Hefley, Elizabeth
90	Hefley, John
91	Henderson, Michael R.
92	Henry, Sheela L.

**Notice of Representation - Exhibit A**

<b>No.</b>	<b>Client Name</b>
93	Hernandez, Fernando
94	Higgins, Eric
95	Hill, Taylor L.
96	Himes, Susan
97	Hines, Jeff
98	Hobbs, Kendall
99	Hoffrichter, Bradley
100	Hoffrichter, Bryan
101	Holden, Donna
102	Holden, Jeffrey R.
103	Holguin, Albert
104	Holguin, Lisa
105	Hughes, Britin C
106	Jacobus, Thomas S.
107	Jones, Billy
108	Katnich, Mirta
109	Kelly, Alaina
110	Kelly, Debra
111	Kelly, William M
112	Kenoyer, Rebecca A.
113	Kent, Brenda
114	Knudson, Kash
115	Kopp, Anna
116	Kopp, Kassandra
117	Krieghoff, Anne B.
118	LaCarrubba, Marissa
119	Lagos, Miguel
120	Learn, Susan
121	Leyn, Judith
122	Liewsvwanphong, Linda
123	Liewsvwanphong, Pridee J. "John"
124	Ljubic, Michael "Mike"
125	Ljubic, Michelle
126	Luna, Leticia
127	Manis, Gregory L.
128	Manis, Laurie L.
129	Marquez, Teresa
130	Mata, Jesus
131	Mayes, Holly L.
132	Mayo, Courtney N.
133	McClellan, Denise
134	McKinley, Carmen
135	McNeil, Elizabeth
136	Medina, Johnathan
137	Meredith, Megan S.
138	Meyer, Austin

**Notice of Representation - Exhibit A**

<b>No.</b>	<b>Client Name</b>
139	Moreno, Elizabeth
140	Moreno, Steve A
141	Mozda, Roger
142	Mulcahy, Kylie D.
143	Murray, Sharmen
144	Musgrave, Riley
145	Nash, Krystal K.
146	Newton, Roberta B.
147	Nicassio, Frank
148	Nicassio, Grace
149	Nugent, Jeanette
150	Nunez, Ana
151	Nunez, Luis
152	Ogazon, Michael
153	Okray, Lindsay
154	Olive, Alicia M.
155	Paiz, Daniel
156	Paiz, Leslie
157	Panno, Haley
158	Paredes-Figueroa, Neptali
159	Pelz, James
160	Puglia, Laura A.
161	Quiroz, Kendall
162	Ramos, Erica
163	Rapio, Oscar
164	Rash, Carissa
165	Rash, Cody
166	Raybuck, Lawrence
167	Rench, Amber
168	Rendon, Stanley
169	Requejo, Jasara
170	Rivera, Heather
171	Rivera, Raymond A.
172	Robertson, Michael
173	Robinson, Cameron
174	Robinson, Timothy
175	Rocha, Bernadette
176	Romero, Claudia
177	Salas, Justine
178	Salas, Victoria
179	Salmon, Harry
180	Salmon, Kitty
181	Sambrano, Amanda
182	Sambrano, Janae
183	Sambrano, Jeffery
184	Sambrano, Michael

**Notice of Representation - Exhibit A**

<b>No.</b>	<b>Client Name</b>
185	Sambrano, Stephan
186	Scharmack, Irene
187	Schavers, Eugene
188	Schmitz, Kim
189	Schubert, Nicole
190	Schwanbeck, Brett
191	Seeger, Janet
192	Segal, Magee R.
193	Sheehe, Alison
194	Sheppard, Rachel
195	Simmons, Justin E.
196	Skoff, Jennifer
197	Smith, Eden
198	Solis, Armando
199	Spencer, Michelle E
200	Speraw, Jerry J.
201	Stewart, Steve
202	Taylor, Derrick D
203	Taylor, Shauntay
204	Tillema, Evan
205	Tillema, Lindsay
206	Tiscareno, Sarah
207	Tomlin, Todd
208	Trask, Rhonda
209	Trujillo, Hamida
210	Uriarte, Jose
211	Uriarte, Ligia
212	Urrizaga, Deborah
213	VanDyke, Cindy
214	Villalba, Sandra
215	Virus, Morgan B.
216	Walz, Stella
217	Wechsler, Amanda
218	Weinreich, Wanda
219	Welch, Wanda
220	West, Serena
221	Wetzel, Christopher
222	White, Autumn C.
223	Williamson, James
224	Wolfe, Neesha
225	Wright, Jade
226	Zaluske, Erik
227	Zarate, Laura
228	Zeeman, Shannon
229	Zeeman, Troy O
230	Zotea, Sharla



**PIERCE | SKRABANEK PLLC**

April 18, 2018

VIA Electronic Mail  
Mr. Michael R. Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
[Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

Dear Mr. Doyen:

Please be advised that the individuals listed in Exhibit A attached hereto are represented by Pierce Skrabanek, PLLC. As counselors for the claimants listed in Exhibit A, we request that all future correspondence or communications be directed to our attention at the following address:

Paul Skrabanek  
Pierce Skrabanek PLLC  
3701 Kirby Dr., Ste. 760  
Houston, TX 77098  
832.690.7000  
832-616-5576 (Fax)  
[Paul@pstriallaw.com](mailto:Paul@pstriallaw.com)  
[Julie@pstriallaw.com](mailto:Julie@pstriallaw.com)

Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should not contact our clients by mail (postal or electronic), phone, or otherwise. Thank you for your anticipated cooperation in this matter.

Sincerely,

PIERCE SKRABANEK, PLLC


  
\_\_\_\_\_  
Michael Pierce  
Paul Skrabanek

Exhibit A

Anderson, Rick	McCann, Shande
Baker, Suzy	McShane, Mark
Barker, Stephanie	Merrifield, Jim
Blake, Jannnette	Moran, Lisa
Blashaw, David	Niro, John
Colasin, Danette	Perez, Joshua Lorenzo
De Armas, William Zenon	Pinales, Juan
Dejesus, Kiah	Polizzi, Cory
Dejesus, Mark	Reid, Paula Jane
Fargo, Ashley	Reynolds, William
Fenwick, Laurianna Jayne	Richter, Timonthy
Frye, Bobbi	Rolland, Michael
Griese, Deanna	Roman, Felisha
Hall, Deborah	Salmeron, Maria
Hall, Steven	Schmidt, Jeremy (son of Patricia Mestas)
Hamel, Michelle	Schreiber, Kristi Lynn
Harman, Justin	Sheeche, Alison
Hulbert, Laurie	Shriver, Malorie
Isabel, Anthony	Sigala, Dorothy
James, Keri	Sisco, Kent
Jeter, Cynthia	Stearns, Shannan
Johnson, Yvonne	Stilwell, Melinda
Johnson, Jared	Stilwell, Michaela
Lanier, Edwin	Tadesse, Meron
Lejardi, Aitor	Todd, Angela
Lejardi, Crystal	Torres, Veronica
Lowe, Courtney	Trujillo, Samuel Lee
Luckadue, Daniel	Van, Jennifer Vlymen
MacArthur, Kimberly	Wake, Autumn
Mangibin, Michelle Xani	Williams, Dayan
Maquindang, Wilifredo	Wilson, Lori Lynn
Mayes, Holly	Wittstock, Sarah Ann

# EGLET PRINCE

September 20, 2018

CSC Corp  
2215 Renaissance Dr.  
Las Vegas, NV 89119

**Re:** Our Client: Imari Ausbie  
Our Case No.: 249469  
Date of Loss: October 1, 2017

Dear Sir or Madam:

Please be advised that this firm has been retained to represent the interests of Imari Ausbie for injuries sustained from the Mandalay Bay, 1 October shooting.

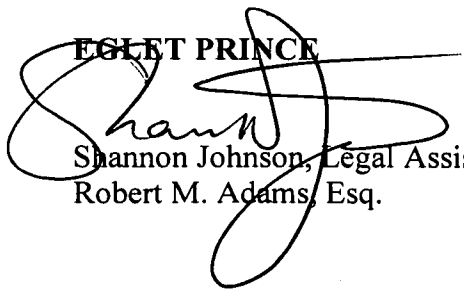
It is our understanding that our client is or was employed by your company at the time of this incident. At this time, we request that you complete the attached form, and return to us as soon as possible. Please return all correspondence and documents to my attention at:

400 South 7<sup>th</sup> Street  
Fourth Floor  
Las Vegas, NV 89101

In addition to the Wage Loss Verification Form, please find our client's signed authorization permitting the release of the requested information. Should you have any questions, please do not hesitate to call my assistant, Shannon at (702) 450-5400. Thank you in advance for your anticipated cooperation.

Sincerely,

EGLET PRINCE

  
Shannon Johnson, Legal Assistant to  
Robert M. Adams, Esq.

RMA:sj



**EMPLOYMENT VERIFICATION**

1. **EMPLOYEE:** Imari Ausbie
2. **SOCIAL SECURITY NO.:** 559-81-2220
3. **DATE OF ACCIDENT:** October 1, 2017
4. **DATES OF EMPLOYMENT:** *from:* \_\_\_\_\_ *to:* \_\_\_\_\_
5. **POSITION AND DUTIES:** \_\_\_\_\_
6. **NUMBER OF HOURS WORKED** *per week (including overtime) prior to accident:*  
\_\_\_\_\_
7. **RATE OF PAY** *including average tips, commissions & bonuses prior to accident:*  
\_\_\_\_\_ \$ \_\_\_\_\_ *per (hour, day, week, etc.)* \_\_\_\_\_
8. **TIME LOST** *due to accident (indicate dates and hours absent):* \_\_\_\_\_  
\_\_\_\_\_
9. **WORK LIMITATIONS** *of employee after return to work:* \_\_\_\_\_  
\_\_\_\_\_
10. **EMPLOYEE PERMANENTLY REPLACED** *because of absence:* Yes \_\_\_\_\_ No \_\_\_\_\_

(COMPANY STAMP)

*Date:* \_\_\_\_\_

*Company:* \_\_\_\_\_

*Signed:* \_\_\_\_\_

*Title:* \_\_\_\_\_

# EGLET PRINCE

4<sup>th</sup> Floor, 400 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101

Telephone: (702) 450-5400  
Facsimile: (702) 450-5451

## RECORDS AUTHORIZATION

### TO WHOM IT MAY CONCERN:

The Undersigned, Imari Ausbie, hereby authorizes and directs all doctors, chiropractors, hospitals, clinics, physical therapy centers, employers, government agencies and all other persons or entities to make available to **EGLET PRINCE**, its assigns or representatives, for examination and/or copying, all records, including billing, relating to the medical condition and treatment and/or employment of the undersigned.

These records include, but are not limited to, copies of diagnoses, physicians notes/orders, records of treatment, reports, charts, police reports, photographs, films, x-rays, MRI's, employment records, personnel files, documents reflecting leaves, absences, terminations or other disciplinary actions and payroll records.

These records are to be used for the evaluation and possible pursuit of a claim for the undersigned. This Authorization is to remain valid until the conclusion of the aforementioned claim.

I understand and acknowledge that information disclosed pursuant to this authorization may be subject to re-disclosure by the recipient, **EGLET PRINCE**, and may no longer be protected by the Health Information Privacy and Accountability Act (HIPAA).

I further fully understand my right to revoke this Authorization, in writing, except to the extent that action has been taken in reliance upon this Authorization.

A photocopy of this Authorization shall be valid.

By presentation of this Authorization, all previous Authorizations are revoked.

This authorization expires on Settlement

Treatment and payment may not be conditioned on obtaining this authorization.

(X) Imari Ausbie

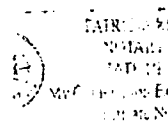
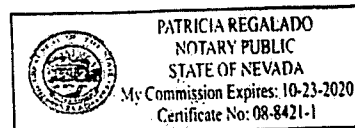
Date 9/20/18

State of Nevada )  
County of Clark )

Subscribed and sworn to before me

Notary Public

My commission expires: 10/23/20





Patrick J. McGroder III  
Attorney  
Direct: (602) 530-8181  
Email: [pjm@gknet.com](mailto:pjm@gknet.com)

April 13, 2018

**Via US Mail**

Mr. Michael R. Doyen  
Munger, Tolles & Olson, LLP  
350 South Grand Avenue, 50<sup>th</sup> Floor  
Los Angeles, California 90071-3426

RE: Las Vegas Shooting Litigation: Notice of Representation of  
Clients to MGM Resorts International, Inc., Mandalay  
Corporation and All Related Entities

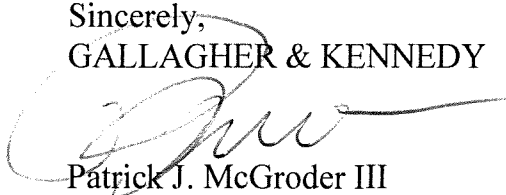
Dear Mr. Doyen:

Please be advised that Patrick J. McGroder III and Patrick J. McGroder IV of  
Gallagher & Kennedy represents Jovanna and Frank Calzadillas with regard to the above.  
As lawyers for the claimants, we request that all future correspondence and/or  
communications be directed to our attention at the following address:

Patrick J. McGroder III  
Patrick J. McGroder IV  
Gallagher & Kennedy  
2575 E. Camelback Road  
Phoenix, Arizona 85016  
Ph: 602-530-8181  
Fax: 602-530-8500  
[pjm@gknet.com](mailto:pjm@gknet.com)  
[patrick.mcgroderiv@gknet.com](mailto:patrick.mcgroderiv@gknet.com)

Thank you for your anticipated cooperation in this matter.

Sincerely,  
GALLAGHER & KENNEDY



Patrick J. McGroder III

PJM/daf  
6559676

# CALLAHAN & BLAINE

*California's Premier Litigation Firm<sup>SM</sup>*

DANIEL J. CALLAHAN  
STEPHEN E. BLAINE  
MICHAEL J. SACHS  
EDWARD SUSOLIK  
BRIAN J. MCCORMACK  
JAVIER H. VAN OORDT  
DAVID J. DARNELL

PETER S. BAUMAN  
JASON CASERO  
RICHARD T. COLLINS  
RAPHAEL CUNG  
DAMON D. EISENBREY  
SALEEM K. ERAKAT  
DAVID E. HAYEN  
LAURA M. MORRIS  
SCOTT D. NELSON  
DANIEL RASHTIAN  
JAMES R. ROUSE  
JAMES M. SABOVICH  
SARAH C. SERPA  
KAMRAN SALOUR  
STEPHANIE A. SPERBER  
JILL A. THOMAS  
JOHN D. VAN ACKEREN  
RYAN J. WILLIAMS  
SHARON T. YUEN

OF COUNSEL  
SCOTT ABERNETHY  
COLDREN LAW OFFICES  
SHELLEY M. LIBERTO  
MATTHEW SYKEN

FIRM ADMINISTRATOR  
LAURALI M. KOBAL, CLM

OUR FILE NUMBER:  
**3872-02**

Member of the  
International Law Firms



April 12, 2018

**VIA EMAIL**

Michael R. Doyen  
Munger, Tolles & Olson, LLP  
350 S. Grand Ave., 50th Fl.  
Los Angeles, CA 90071  
[michael.doyen@mto.com](mailto:michael.doyen@mto.com)

**RE: Las Vegas Shooting Litigation  
Notice of Representation of Clients to MGM Resorts International,  
Inc., Mandalay Corporation, and All Related Entities**

Dear Mr. Doyen:

Please be advised that the following individuals are represented by Callahan & Blaine, APLC:

Larissa Coburn  
Ellenor Gargano  
Michell Goble

As counselors for the claimants, we request that all future correspondence or communications be directed to our attention at the following address:

Sarah C. Serpa  
Callahan & Blaine, APLC  
3 Hutton Centre Dr., 9th Fl.  
Santa Ana, CA 92707

Effective immediately, MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities should not contact our clients by mail (postal or electronic), phone, or otherwise.

Thank you for your anticipated cooperation in this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Sarah C. Serpa", is written over a horizontal line.  
Sarah C. Serpa

SCS/kk



Downtown L.A. Law Group, LLP  
3470 Wilshire Boulevard, Suite 634  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2775

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

November 09, 2017

SENT VIA E-MAIL- [kdavis@lv.mgmgrand.com](mailto:kdavis@lv.mgmgrand.com)

Tel.: 877-880-0880

Fax: 702-891-3146

RE: Our Client Patricia Criss

Date of Loss 10/01/2017

Dear Mrs. Davis,

This firm has been retained by the above client to pursue a bodily injury and property damage claim against your insured.

Pursuant to §2695.7 [Standards for Prompt Fair and Equitable Settlements§ (b)], upon receiving proof of claim, every insurer shall immediately, but in no event more than forty (40) calendar days later, accept or deny the claim in whole or in part, and affirm or deny liability.

Please refrain from contacting our client, and refer all documents and correspondences to the attention of the undersigned. ALL PAYMENTS made to any individual, or entity regarding this accident, including but not limited to bodily injury or med pay, must bear our name as co-payee as we do maintain a lien on this claim. This does not apply to property damage.

THIS IS A FORMAL REQUEST FOR IMMEDIATE WRITTEN DISCLOSURE OF YOUR INSURED'S POLICY LIMITS. Please submit, in writing, your insured's policy limits to my office immediately upon availability.

It is requested that you contact this office at your earliest convenience to discuss this matter further.

Very truly yours,  
Downtown L.A. Law Group

~

Amy Gomez  
Case Manager

November 09, 2017

SENT VIA EMAIL - kdavis@lv.mgmgrand.com

Tel.: 877-880-0880

Fax: 702-891-3146

RE: PRESERVATION OF EVIDENCE

Our Client                      Patrici Criss

Date of Loss                      10/01/2017

Dear Mrs. Davis,

Please be advised that this office represents the above clients for the injuries suffered at the hands of MGM Grand. Please have all of your representatives direct all correspondences regarding this incident to this office directly. Neither you nor anyone on your behalf has permission to speak to our client regarding this case.

We hereby formally request that you preserve all evidence in this case. Do not modify, alter or destroy any documents, images, recordings, or data that relates to this case. Do not permit anyone to modify, alter or destroy any such items. As the California Supreme Court has stated: "Destroying evidence can destroy fairness and justice, for it increases the risk of an erroneous decision on the merits of the underlying cause of action. Destroying evidence can also increase the costs of litigation as parties attempt to reconstruct the destroyed evidence or to develop other evidence, which may be less accessible, less persuasive, or both." *Cedars-Sinai Medical Center v. Superior Court* (1998) 18 Cal.4th 1, 8.

Please be advised that your failure to preserve the items will result in extremely unfavorable consequences to you. Indeed, be advised that we intend to seek remedies against you if you allow crucial evidence in this case to be modified, altered or destroyed. For instance, chief among these is the evidentiary inference that evidence which one party has destroyed or rendered unavailable was unfavorable to that party. *Id.* at 11; *Evidence Code* § 413. As presently set forth in *Evidence Code* § 413, this inference is as follows: "In determining what inferences to draw from the evidence or facts in the case against a party, the trier of fact may consider, among other things, the party's ... willful suppression of evidence relating thereto...." The standard California jury instructions include an instruction on this inference as well: "If you find that a party willfully suppressed evidence in order to prevent its being presented in this trial, you may consider that fact in determining what inferences to draw from the evidence." (BA.11 No. 2.03 (8th ed.1994). *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 12.

In addition to the evidentiary inference, our discovery laws provide a broad range of sanctions for conduct that amounts to a "[misuse] of the discovery process." *Code of Civil Procedure* § 2023. Destroying evidence in response to a discovery request after litigation has

commenced would surely be a misuse of discovery within the meaning of § 2023, as would such destruction in anticipation of a discovery request. *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 12 (Emphasis added). The sanctions under *Code of Civil Procedure* § 2023 are potent. They include monetary sanctions, contempt sanctions, issue sanctions ordering that designated facts be taken as established or precluding the offending party from supporting or opposing designated claims or defenses, evidence sanctions prohibiting the offending party from introducing designated matters into evidence, and terminating sanctions that include striking part or all of the pleadings, dismissing part or all of the action, or granting a default judgment against the offending party. *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 12.

Additionally, lawyers are subject to discipline, including suspension and disbarment, for participating in the suppression or destruction of evidence. *Business & Professions Code* § 6106 ["The commission of any act involving moral turpitude, dishonesty or corruption ... constitutes a cause for disbarment or suspension."]; *Rules Professional Conduct*, Rule 5-220 ["A member shall not suppress any evidence that the member or the member's client has a legal obligation to reveal or to produce."].) The purposeful destruction of evidence by a client while represented by a lawyer may raise suspicions that the lawyer participated as well. Even if these suspicions are incorrect, a prudent lawyer will wish to avoid them and the burden of disciplinary proceedings in which they may give rise and will take affirmative steps to preserve and safeguard relevant evidence. *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 13.

Finally, *Penal Code* § 135 creates criminal penalties for spoliation. "Every person who, knowing that any book, paper, record, instrument in writing, or other matter or thing, is about to be produced in evidence upon any trial, inquiry, or investigation whatever, authorized by law, willfully destroys or conceals the same, with intent thereby to prevent it from being produced, is guilty of a misdemeanor." *Cedars-Sinai Medical Center, supra*, 18 Cal.4th at 13.

Accordingly, please advise us immediately of the status of any such evidence and your intentions with respect to its preservation.

#### Other Documents and ESI Evidence

You are hereby given further notice to immediately take all steps necessary to prevent the destruction, loss, concealment, or alternation of any paper, document, or electronically stored information ("ESI") and other data or information generated by and/or stored on your computers and storage media (e.g. hard disks, floppy disks, backup tapes, etc.), and emails related to this incident.

You should anticipate that much of the information subject to disclosure and responsive to discovery in this action is stored on your current or former computer systems and other media and devices (including personal digital or data assistants, voice-messaging or voice-mail systems, online repositories, and cell phones).

ESI should be afforded the broadest possible definition and includes, but is not limited to, all digital communications (e.g., e-mail, voice mail, instant messaging), word processed documents (e.g. Word and WordPerfect documents and drafts), spreadsheets and tables (e.g. Excel and Lotus 123 worksheets), accounting application data (such as QuickBooks, Money, or Peachtree), image and facsimile files (including PDF, TIFF, JPG, and GIF images), sound recordings (including WAV and MP3 files), video recordings, all databases, all contact and relationship management data, calendar and diary application data, online access data (including temporary, internet files, History, and Cookies), all presentations (including PowerPoint and Corel), all network access and server activity logs, all data created with the use of any Personal Data Assistant (PDA) such as Palm Pilot, HP Jornada, Cassiopeia, or other Windows-based or Pocket PC devices, all CAD files, and all back-up and archival files.



Adequate preservation of ESI requires more than simply refraining from efforts to destroy or dispose of such evidence. You must also intervene to prevent loss due to routine operations and employ proper techniques to safeguard all such evidence.

Because hard copies do not preserve electronic searchability or metadata, they are not an adequate substitute for ESI. If information exists in both electronic and paper form, you should preserve them both.

## **LITIGATION HOLD**

You are requested to immediately initiate a litigation hold for potentially relevant ESI, documents, and tangible things, and to act diligently and in good faith to secure and audit compliance with that litigation hold. You are also requested to preserve and not destroy all passwords, decryption procedures (including, if necessary, the software to decrypt the files), network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction software, and any and all other information and things necessary to access, view, and (if necessary) reconstruct any ESI. You should not pack, compress, purge, or dispose of any file or any part thereof.

You are further requested to immediately identify and modify or suspend features of your operations, information systems, and devices that, in routine operations, operate to cause the loss of documents, tangible items, or ESI. Examples of such features and operations include, but are not limited to, purging the contents of e-mail repositories by age, capacity, or other criteria; using data or media wiping, disposal, erasure, or encryption utilities or devices; overwriting, erasing, destroying, or discarding back-up media; re-assigning, re-imaging or disposing of systems, servers, devices, or media; running antivirus or other programs that alter metadata; using metadata stripper utilities; and destroying documents or any ESI by age or other criteria.

## **SERVERS**

With respect to servers like those used to manage electronic mail and network storage, the entire contents of each user's network share and e-mail account should be preserved and not modified.

## **STORAGE**

With respect to on-line storage and/or direct access storage devices attached to your mainframe computers and/or minicomputers, in addition to the above, you are not to modify or delete any ESI, "deleted" files, and/or file fragments existing on the date of this letter's delivery that contain potentially relevant information.

With regard to all electronic media used for off-line storage, including magnetic tapes and cartridges, optical media, electronic media, and other media or combinations of media containing potentially relevant information, you are requested to stop any activity which may result in the loss of any ESI, including rotation, destruction, overwriting and erasure in whole or



in part. This request is intended to cover all media used for data or information storage in connection with your computer systems, including magnetic tapes and cartridges, magneto-optical disks, floppy diskettes, and all other media, whether used with personal computers, minicomputers, mainframes or other computers, and whether containing backup and/or archival ESI.

#### **PERSONAL COMPUTERS**

You should take immediate steps to preserve all ESI on all personal computers used by your officers, directors and employees, including all secretaries and assistants, that in any way relate to the [subject matter of action], and the events and causes of action described in the Complaint. As to fixed devices, (1) a true and correct copy is to be made of all such ESI, including all active files and completely restored versions of all deleted electronic files and file fragments; (2) full directory listings (including hidden files) for all directories and subdirectories (including hidden directories) on such fixed devices should be written; and (3) all such copies and listings are to be preserved until this litigation is ended. As to floppy diskettes, CDs, tapes, and other non-fixed media relating to this matter, they are to be collected and stored pending resolution of this litigation.

#### **PORTABLE SYSTEMS**

In addition to your immediate preservation of ESI, documents and tangible items in your business, on servers and workstations, you should also determine if any home or portable systems may contain potentially relevant data or information. To the extent that officers, board members, or employees have sent or received potentially relevant e-mails or created or reviewed potentially relevant documents away from the office, you must preserve the contents of systems, devices, and media used for these purposes (including not only potentially relevant data from portable and home computers, but also from portable thumb drives, CD-R discs, PDAs, smart phones, voice mailboxes, or other forms of ESI storage). Additionally, if any employees, officers, or directors used online or browser-based e-mail accounts or services to send or receive potentially relevant messages and attachments, the contents of these account mailboxes should be preserved.

#### **EVIDENCE CREATED OR ACQUIRED IN THE FUTURE**

With regard to documents, tangible things, and ESI that are created or come into your custody, possession, or control subsequent to the date of delivery of this letter, potentially relevant evidence is to be preserved. You should take all appropriate action to avoid destruction of potentially relevant evidence.

Please forward a copy of this letter to all persons and entities possessing or controlling potentially relevant evidence. Your obligation to preserve potentially relevant evidence is required by law.

Very truly yours,  
Downtown L.A. Law Group

A handwritten signature in black ink, appearing to read 'Amy Gomez Case', with a stylized flourish at the end.

Amy Gomez Case  
Manager  
Amy@downtownlalaw.com



Downtown L.A. Law Group, LLP  
3460 Wilshire Boulevard, Suite 950  
Los Angeles, California 90010  
Phone: (213) 389-3765  
Facsimile: (877) 389-2775

[www.DowntownLALaw.com](http://www.DowntownLALaw.com)

## **LETTER OF DESIGNATION**

I, the undersigned do hereby designate Downtown L.A. Law Group, located at 3470 Wilshire Blvd., Suite #634, Los Angeles, CA 90010, as my representatives to handle all transactions, including but not limited to, medical records, police reports, insurance claims and any/all negotiations that have arisen from any Tortious behavior or civil wrong including but not limited to auto/motorcycle accidents.

All communications and correspondence are to be directed to the Downtown L.A. Law. The designation is pursuant to California Code of Regulations, 10 Chapter 5, Subchapter 8, Section 2695.2(c).

Date of Incident: 10/1/17

Patricia Criss  
Signature

Today's Date: 10/27/17

Patricia Criss  
Print Name

# OWEN, PATTERSON & OWEN LLP

GREGORY J. OWEN\*  
RICHARD A. PATTERSON\*  
SUSAN A. OWEN\*  
TAMIKO B. HERRON  
J. CODY PATTERSON  
DAVID TORRES-SIEGRIST\*\*

Attorneys at Law  
23822 West Valencia Boulevard, Suite 303  
Valencia, California 91355

Tel.: (661) 799-3899  
Fax: (661) 799-2774

www.opolaw.com  
info@owenpatterson.com

\* PROFESSIONAL CORPORATION  
\*\* OF COUNSEL

November 22, 2017

**VIA USPS CERTIFIED MAIL,**  
**RETURN RECEIPT REQUESTED**

Mandalay Corporation  
2215-B Renaissance Drive  
Las Vegas, Nevada 89119

Re: Our Clients: Amanda Davis, Travis Phippen, Nathan Phippen,  
Cherish McGuire, Jack Pinkston, Jaeger Woodsen, Charles  
Mayfield, Victoria Blackbird, Shawn McKay, Tara Reyes,  
Stacey Brown-Fusano, Kendall Dusenberry, Shawn Scarlett,  
Shaylenne Scarlett, Sarah Scarlett, Savannah Thomas,  
Gabrielle Thomas, Russel Bleck, Brian Mallette,  
Gilbert Segovia, Alicia Segovia, Derek Miller, Troy Springer,  
Shannon Springer, Kiersten Harling, Simon Harling,  
Frank Sena, Steven Flores, Julie Dove, Thomas Durell,  
Renee Salazar, Selso Salazar, Marie Tautrim, Jeremy Viger,  
Amy Viger, Brian O'Leary, Carrie O'Leary,  
Rebekah Scheussler, Michael Tautrim, Breanna Skagen,  
Patty Cope, Peter Violas, Jacob Ratliff, Mylika Pope,  
Rob Jones, Misty Jones, Kari Carlstrom, Dominic Rabanal,  
Ilene Scandlyn, Casey Scandlyn, Steve Gomez,  
Julie Gomez, Mike Greenfield, Ruben Talamantez,  
Patrick Hobbs, Gloria Aguirre, Calia Sanford, Mike Rogozik,  
Monica Rogozik, Rebecca Wilken, Jamie Lavery,  
Sophia Lima, Gary Aase, David Aase, Crystal Salazar,  
Wendy Heirshberg, Steven Heirshberg, Brooke Laney,  
Robert Bradshaw, Chris Powell, Michelle Powell,  
Cindy Bradshaw, Jessi Presten, Amy Bergin,  
Diana De La Maza, Vincent Sager, Lee Skolnick,  
Kortney Spencer, and Ethan Sanchez

Dear Sir/Madam:

This office represents the above mentioned clients for injuries and damages sustained as a result of the incident on October 1, 2017 at the Route 91 Harvest Festival. Please be advised that a claim for damages is hereby being made on our clients' behalf.

November 22, 2017

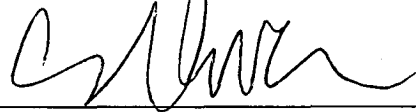
Page 2

Please direct all further communications to this office. Please refrain from contacting our clients, directly or indirectly, in any manner whatsoever.

Thank you for your anticipated cooperation and courtesy in this matter.

Very truly yours,

OWEN, PATTERSON & OWEN, LLP

A handwritten signature in black ink, appearing to read 'G. J. Owen', written over a horizontal line.

GREGORY J. OWEN, ESQ.

RICHARD A. PATTERSON, ESQ.

SUSAN A. OWEN, ESQ.

## OWEN, PATTERSON & OWEN LLP

GREGORY J. OWEN\*  
RICHARD A. PATTERSON\*  
SUSAN A. OWEN\*  
TAMIKO B. HERRON  
J. CODY PATTERSON  
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Tel.: (661) 799-3899  
Fax: (661) 799-2774

www.opolaw.com  
info@owenpatterson.com

\*PROFESSIONAL CORPORATION  
\*\*OF COUNSEL

November 22, 2017

**VIA USPS CERTIFIED MAIL,**  
**RETURN RECEIPT REQUESTED**

MGM Grand Hotel, LLC  
2215-B Renaissance Drive  
Las Vegas, Nevada 89119

Re: Our Clients: Amanda Davis, Travis Phippen, Nathan Phippen, Cherish McGuire, Jack Pinkston, Jaeger Woodsen, Charles Mayfield, Victoria Blackbird, Shawn McKay, Tara Reyes, Stacey Brown-Fusano, Kendall Dusenberry, Shawn Scarlett, Shaylenne Scarlett, Sarah Scarlett, Savannah Thomas, Gabrielle Thomas, Russel Bleck, Brian Mallette, Gilbert Segovia, Alicia Segovia, Derek Miller, Troy Springer, Shannon Springer, Kiersten Harling, Simon Harling, Frank Sena, Steven Flores, Julie Dove, Thomas Durell, Renee Salazar, Selso Salazar, Marie Tautrim, Jeremy Viger, Amy Viger, Brian O'Leary, Carrie O'Leary, Rebekah Scheussler, Michael Tautrim, Breanna Skagen, Patty Cope, Peter Violas, Jacob Ratliff, Mylika Pope, Rob Jones, Misty Jones, Kari Carlstrom, Dominic Rabanal, Ilene Scandlyn, Casey Scandlyn, Steve Gomez, Julie Gomez, Mike Greenfield, Ruben Talamantez, Patrick Hobbs, Gloria Aguirre, Calia Sanford, Mike Rogozik, Monica Rogozik, Rebecca Wilken, Jamie Lavery, Sophia Lima, Gary Aase, David Aase, Crystal Salazar, Wendy Heirshberg, Steven Heirshberg, Brooke Laney, Robert Bradshaw, Chris Powell, Michelle Powell, Cindy Bradshaw, Jessi Presten, Amy Bergin, Diana De La Maza, Vincent Sager, Lee Skolnick, Kortney Spencer, and Ethan Sanchez

Dear Sir/Madam:

This office represents the above mentioned clients for injuries and damages sustained as a result of the incident on October 1, 2017 at the Route 91 Harvest Festival. Please be advised that a claim for damages is hereby being made on our clients' behalf.

November 22, 2017

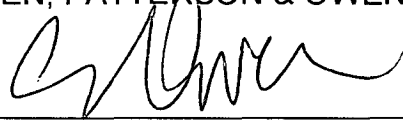
Page 2

Please direct all further communications to this office. Please refrain from contacting our clients, directly or indirectly, in any manner whatsoever.

Thank you for your anticipated cooperation and courtesy in this matter.

Very truly yours,

OWEN, PATTERSON & OWEN, LLP

A handwritten signature in black ink, appearing to read 'G. J. Owen', written over a horizontal line.

GREGORY J. OWEN, ESQ.

RICHARD A. PATTERSON, ESQ.

SUSAN A. OWEN, ESQ.

# OWEN, PATTERSON & OWEN LLP

GREGORY J. OWEN\*  
RICHARD A. PATTERSON\*  
SUSAN A. OWEN\*  
TAMIKO B. HERRON  
J. CODY PATTERSON  
DAVID TORRES-SIEGRIST\*\*

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Fax: (661) 799-2774

www.opolaw.com  
info@owenpatterson.com

\* PROFESSIONAL CORPORATION  
\*\* OF COUNSEL

November 22, 2017

**VIA USPS CERTIFIED MAIL,**  
**RETURN RECEIPT REQUESTED**

MGM Resorts International Operations, Inc.  
2215-B Renaissance Drive  
Las Vegas, Nevada 89119

Re: Our Clients: Amanda Davis, Travis Phippen, Nathan Phippen, Cherish McGuire, Jack Pinkston, Jaeger Woodsen, Charles Mayfield, Victoria Blackbird, Shawn McKay, Tara Reyes, Stacey Brown-Fusano, Kendall Dusenberry, Shawn Scarlett, Shaylenne Scarlett, Sarah Scarlett, Savannah Thomas, Gabrielle Thomas, Russel Bleck, Brian Mallette, Gilbert Segovia, Alicia Segovia, Derek Miller, Troy Springer, Shannon Springer, Kiersten Harling, Simon Harling, Frank Sena, Steven Flores, Julie Dove, Thomas Durell, Renee Salazar, Selso Salazar, Marie Tautrim, Jeremy Viger, Amy Viger, Brian O'Leary, Carrie O'Leary, Rebekah Scheussler, Michael Tautrim, Breanna Skagen, Patty Cope, Peter Violas, Jacob Ratliff, Mylika Pope, Rob Jones, Misty Jones, Kari Carlstrom, Dominic Rabanal, Ilene Scandlyn, Casey Scandlyn, Steve Gomez, Julie Gomez, Mike Greenfield, Ruben Talamantez, Patrick Hobbs, Gloria Aguirre, Calia Sanford, Mike Rogozik, Monica Rogozik, Rebecca Wilken, Jamie Lavery, Sophia Lima, Gary Aase, David Aase, Crystal Salazar, Wendy Heirshberg, Steven Heirshberg, Brooke Laney, Robert Bradshaw, Chris Powell, Michelle Powell, Cindy Bradshaw, Jessi Presten, Amy Bergin, Diana De La Maza, Vincent Sager, Lee Skolnick, Kortney Spencer, and Ethan Sanchez

Dear Sir/Madam:

This office represents the above mentioned clients for injuries and damages sustained as a result of the incident on October 1, 2017 at the Route 91 Harvest Festival. Please be advised that a claim for damages is hereby being made on our clients' behalf.



November 22, 2017

Page 2

Please direct all further communications to this office. Please refrain from contacting our clients, directly or indirectly, in any manner whatsoever.

Thank you for your anticipated cooperation and courtesy in this matter.

Very truly yours,

OWEN, PATTERSON & OWEN, LLP

A handwritten signature in black ink, appearing to read 'G. Owen', is written over a horizontal line.

GREGORY J. OWEN, ESQ.

RICHARD A. PATTERSON, ESQ.

SUSAN A. OWEN, ESQ.

# NURENBERG $\square$ PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

March 8, 2018

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE:	My Client:	Phillip James Cody Demasseo
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80734

Dear Sir/Madam:

Please be advised that this office has been retained to represent Phillip James Cody Demasseo for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,

Jordan D. Lebovitz

JDL/ep

# NURENBERG PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

October 19, 2017

**SENT VIA CERTIFIED**  
**AND REGULAR U.S. MAIL**

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE: My Client: Lee Dorchak  
Date of Injury: October 1, 2017  
Location of Incident: Mandalay Bay, Las Vegas, NV  
Your Client: MGM Resorts International

**NOTICE TO PRESERVE EVIDENCE**

Dear Sir/Madam:

I write to inform you that the Lee Dorchak has retained this law firm to represent him as a result of the shooting that took place near Mandalay Bay in Las Vegas, Nevada on October 1, 2017/

**You are hereby placed on notice pursuant to NRS 47.250 to preserve all evidence related to the above-captioned accident.** This evidence includes but is not limited to preservation of the following:

1. Any and all photographs, video, computer generated media, surveillance video or other recordings of the interior and exterior of Mandalay Bay property involved in this shooting, the specific hotel room of Stephen Paddock, the occurrence, the freight elevators at or near the site of the occurrence.
2. Any and all weapons, guns and recovered ammunition involved in this shooting.
3. Any and all material evidence recovered from the room(s) occupied by Stephen Paddock at Mandalay Bay on October 1, 2017.
4. Any and all cell phone records and billing statements for any director, employee or security personnel on duty at Mandalay Bay for the 24 hour period before and immediately after the shooting.

October 19, 2017

Page 2

5. Guest records and accounting records for any reservations made by Stephen Paddock at any MGM Resorts International property in Las Vegas, Nevada for a period of 12 months prior to the shooting.

6. The entire personnel file of any security guard employed by Mandalay Bay, MGM Resorts International or outside contractors that were on duty on the day involved in this shooting, and within 72 hours prior to said shooting.

7. Complete training documents related to any security guards and hotel personnel employed by Mandalay Bay, MGM Resorts International or outside contractors that were on duty on the day involved in this shooting, and within 72 hours of said shooting.

8. Any e-mails, electronic messages, letters, memos, or other documents concerning this shooting.

9. Any and all computer, electronic, or e-mail messages created in the first forty eight hours immediately after the incident, by and between the defendant and any agents or third parties relating to the facts, circumstances, or actual investigation of the incident as well as any computer messages which relate to this particular incident, whether generated or received.

10. Complete records of all activity and winnings of Stephen Paddock at any MGM Resort International property at any time in the past 3 years.

11. All logs of activity (both in paper and electronic formats) on computer systems and networks that have or may have been used to process or store electronic data containing information about or related to winnings earned by Stephen Paddock.

12. Courts have made it clear that all information available on electronic storage media is discoverable, whether readily readable ("active") or "deleted" but recoverable. See, e.g., *Santiago v. Miles*, 121 F.R.D. 636, 640 (W.D.N.Y. 1988; a request for "raw information in computer banks" was proper and obtainable under the discovery rules); *Gates Rubber Co. v. Bando Chemical Indus., Ltd.*, 167 F.R.D. 90, 112 (D. Colo. 1996; mirror-image copy of everything on a hard drive "the method which would yield the most complete and accurate results," chastising a party's expert for failing to do so); and *Northwest Airlines, Inc. v. Teamsters Local 2000*, 163 L.R.R.M. (BNA) 2460, (USDC Minn. 1999); court ordered image- copying by Northwest's expert of home computer hard drives of employees suspected of orchestrating an illegal "sick-out" on the Internet).

Accordingly, electronic data and storage media that may be subject to our discovery requests and that your client(s) are obligated to maintain and not alter or destroy, include but are not limited to the following:

October 19, 2017

Page 3

Introduction: description of files and file types sought

a. All digital or analog electronic files, including “deleted” files and file fragments, stored in machine-readable format on magnetic, optical or other storage media, including the hard drives or floppy disks used by your computers and their backup media (e.g., other hard drives, backup tapes, floppy disks, DVD’s, Jaz cartridges, CD-ROMs, etc.) or otherwise, whether such files have been reduced to paper printouts or not. More specifically, you are to preserve all of your e-mails, both sent and received, whether internally or externally; all word-processed files, including drafts and revisions; all spreadsheets, including drafts and revisions; all databases; all CAD (computer-aided design) files, including drafts and revisions; all presentation data or slide shows produced by presentation software (such as Microsoft PowerPoint); all graphs, charts and other data produced by project management software (such as Microsoft Project); all data generated by calendaring, task management and personal information management (PIM) software (such as Microsoft Outlook or Lotus Notes); all data created with the use of personal data assistants (PDAs), such as Blackberry, I-Pad, HP Jornada, Cassiopeia or other Windows CE-based or Pocket PC devices; all data created with the use of document management software; all data created with the use of paper and electronic mail logging and routing software; all Internet and Web-browser-generated history files, caches and “cookies” files generated at the workstation of each employee and/or agent in your employ and on any and all backup storage media; and any and all other files generated by users through the use of computers and/or telecommunications, including but not limited to voice mail. Further, you are to preserve any log or logs of network use by employees or otherwise, whether kept in paper or electronic form, and to preserve all copies of your backup tapes and the software necessary to reconstruct the data on those tapes, so that there can be made a complete, bit-by-bit “mirror” evidentiary image copy of the storage media of each and every personal computer (and/or workstation) and network server in your control and custody, as well as image copies of all hard drives retained by you and no longer in service, but in use at any time from one (1) month prior to the accident to the present.

You are also not to pack, compress, purge or otherwise dispose of files and parts of files unless a true and correct copy of such files is made.

You are also to preserve and not destroy all passwords, decryption procedures (including, if necessary, the software to decrypt the files); network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction software, and any and all other information and things necessary to access, view and (if necessary) reconstruct the electronic data we will request through discovery.



October 19, 2017

Page 4

b. Business Records: All documents and information about documents containing backup and/or archive policy and/or procedure, document retention policy, names of backup and/or archive software, names and addresses of any offsite storage provider.

c. Online Data Storage: With regard to online storage, back-up, and/or direct access storage devices attached to your mainframe computers and/or minicomputers: they are not to modify or delete any electronic data files, "deleted" files and file fragments existing at the time of this letter's delivery, which meet the definitions set forth in this letter, unless a true and correct copy of each such electronic data file has been made and steps have been taken to assure that such a copy will be preserved and accessible for purposes of this litigation.

d. Offline Data Storage, Backups and Archives, Floppy Diskettes, Hard Disks, Tapes and Other Removable Electronic Media: With regard to all electronic media used for offline storage, including magnetic tapes and cartridges and other media that, at the time of this letter's delivery, contained any electronic data meeting the criteria listed above: You are to stop any activity that may result in the loss of such electronic data, including rotation, destruction, overwriting and/or erasure of such media in whole or in part. This request is intended to cover all removable electronic media used for data storage in connection with their computer systems, including magnetic tapes and cartridges, magneto-optical disks, floppy diskettes and all other media, whether used with personal computers, minicomputers or mainframes or other computers, and whether computer systems.

13. All word processing files, including prior drafts, "deleted" files and file fragments, containing information about or related to security, safety and safety policies.

14. Replacement of Data Storage Devices: You or your agents are not to dispose of any electronic data storage devices and/or media that may be replaced due to failure and/or upgrade and/or other reasons that may contain electronic data meeting the criteria listed above.

15. Fixed Drives on Stand-Alone Personal Computers and Network Workstations: With regard to electronic data meeting the criteria listed above, which existed on fixed drives attached to stand-alone microcomputers and/or network workstations at the time of this letter's delivery: You are not to alter or erase such electronic data, and not to perform other procedures (such as data compression and disk defragmentation or optimization routines) that may impact such data, unless a true and correct copy has been made of such active files and of completely restored versions of such deleted electronic files and file fragments, copies have been made of all directory listings (including hidden files) for all directories and subdirectories containing such files, and arrangements have been made to preserve copies during the pendency of this litigation.



October 19, 2017

Page 5

16. Programs and Utilities: You are to preserve copies of all application programs and utilities, which may be used to process electronic data covered by this letter.

17. Log of System Modifications: You are to maintain an activity log to document modifications made to any electronic data processing system that may affect the system's capability to process any electronic data meeting the criteria listed above, regardless of whether such modifications were made by employees, contractors, vendors and/or any other third parties.

18. Personal Computers Used by Your Employees and/or Their Secretaries and Assistants: The following steps should immediately be taken in regard to all personal computers used by your employees and/or their secretaries and assistants:

a. As to fixed drives attached to such computers: (i) a true and correct copy is to be made of all electronic data on such fixed drives relating to this matter, including all active files and completely restored versions of all deleted electronic files and file fragments; (ii) full directory listings (including hidden files) for all directories and subdirectories (including hidden directories) on such fixed drives should be written; and (iii) such copies and listings are to be preserved until this matter reaches its final resolution.

b. All floppy diskettes, magnetic tapes and cartridges, and other media used in connection with such computers prior to the date of delivery of this letter containing any electronic data relating to this matter are to be collected and put into storage for the duration of this lawsuit.

19. Evidence Created Subsequent to This Letter: With regard to electronic data created subsequent to the date of delivery of this letter, relevant evidence is not to be destroyed and you are to take whatever steps are appropriate to avoid destruction of evidence.

In order to assure that your obligation to preserve documents and things is met, please immediately forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter, to specifically include third parties and vendors.

You are required to preserve all evidence related to the above-captioned accident in the precise condition that it was immediately after the injury. If you do not do so for a period of time sufficient to permit our inspection and our experts' inspection and investigation of this accident, a presumption that the evidence was changed, altered, or spoiled may arise and be used against you in a court of law.

October 19, 2017

Page 6

If you have any questions, please call me. I thank you in advance for your prompt and kind attention to this matter.

Very truly yours,

Jordan D. Lebovitz

JDL/tdb





**BROWNE GEORGE ROSS** LLP  
Los Angeles · New York · San Francisco

101 California Street, Suite 1225  
San Francisco, California 94111  
T (415) 391-7100 F (415) 391-7198

Kevin F. Rooney  
Direct Dial: (415) 268-9802  
krooney@bgrfirm.com

File No. 7697-001

December 15, 2017

**Via E-Mail and U.S. Mail**

Michael Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue  
Los Angeles, CA 90071  
E-Mail: michael.doyen@mtol.com

Re: Vincent Etcheber / Estate of Stacey Etcheber

Dear Michael:

Please be advised that our office has been retained to represent the Estate of Stacey Etcheber and her surviving husband, Vincent Etcheber. Mrs. Etcheber was shot and killed on October 1, 2017 while attending the Route 91 Harvest Festival ("Festival") by a gunman on the 32<sup>nd</sup> floor of the Mandalay Bay Resort and Casino, which is owned by MGM Resorts International ("MGM"). I understand that you represent MGM. I further understand that you have been in contact with counsel representing other victims that attended the Festival. Although we have not yet filed suit concerning these events, please include my partner, Andrew August, and me in all future correspondence with plaintiffs' counsel concerning this matter. My email address is above and Andrew's is [aaugust@bgrfirm.com](mailto:aaugust@bgrfirm.com). If you require anything else in addition to this representation letter, please let me know at your earliest convenience.

Very truly yours,



Kevin F. Rooney

KFR:cc

**GALLOWAY & JENSEN**  
A PROFESSIONAL CORPORATION

ROBERT R. JENSEN

222 CALIFORNIA AVENUE  
RENO, NEVADA 89509  
TELEPHONE (775) 333-7555  
FAX (775) 323-4993  
WWW.GALLOWAYJENSEN.COM

GRAHAM GALLOWAY

October 16, 2017

**Via U.S. Mail**

Mandalay Bay Resort  
3950 Las Vegas Blvd. South  
Las Vegas, NV 89119

RE: Our Client : Emily Evans  
Date of Loss : 10/1/2017

Dear Mandalay Bay Resort:

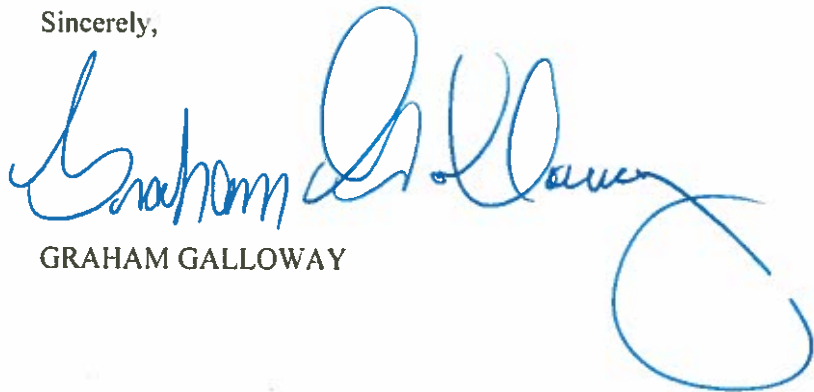
This firm has been retained to represent Emily Evans for injuries sustained as a result of an incident, which occurred on 10/1/2017.

If you have liability insurance coverage, you may wish to advise your insurance company of this incident.

We are at this time investigating the incident. If you would complete the requested information on the attached form, and return it to our office in the enclosed self-addressed pre-paid envelope, we will try not to inconvenience you any further regarding this matter.

Thank you for your anticipated cooperation and should you have any questions, please feel free to contact this office.

Sincerely,



GRAHAM GALLOWAY

GG:rs  
Enclosure  
cc: Emily Evans

Mandalay Bay Resort  
3950 Las Vegas Blvd. South  
Las Vegas, NV 89119

RE: Our Client : Emily Evans  
Our File Number : 314598  
Date of Loss : 10/1/2017

INSURANCE COMPANY \_\_\_\_\_  
POLICY NUMBER \_\_\_\_\_  
EXPIRATION DATE \_\_\_\_\_  
AGENT/ADJUSTER NAME \_\_\_\_\_  
TELEPHONE NUMBER \_\_\_\_\_  
ADDRESS \_\_\_\_\_  
CITY, STATE ZIP \_\_\_\_\_

Has the claim been reported? \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, to whom was the claim reported? \_\_\_\_\_

I did not carry insurance on 10/1/2017. \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

PLEASE RETURN TO: **GALLOWAY & JENSEN**  
**222 California Avenue**  
**Reno, NV 89509**



THE CLAYPOOL LAW FIRM

Trial Lawyers



April 12, 2018

Via Electronic Mail  
Mr. Michael Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50<sup>th</sup> Floor  
Los Angeles, CA 90071-3426  
Michael.Doyen@mto.com

Re: Las Vegas Shooting Litigation: Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

Dear Mr. Doyen:

Please be advised that the individuals listed in Exhibit A attached hereto are represented by the Claypool Law Firm. As counselor for the claimants listed in Exhibit A, I request that all future correspondence or communications be directed to my attention at the following address:

Brian E. Claypool  
The Claypool Law Firm  
4 E. Holly St., Suite 201  
Pasadena, CA 91103  
brian@claypoollawfirm.com

Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities should not contact our clients by mail (postal or electronic), phone, or otherwise. Thank you for your anticipated cooperation in this matter.

Very Truly Yours,

Brian E. Claypool

**EXHIBIT A**

- Lisa Fine
- Brett DeLaura
- Avonna Murfitt
- Paul Rabinowitz
- Sherry Callis
- Wendy Cooper
- Kelli Turnbow
- Cindy Young
- Carly Betzler
- Emma Simon
- Patricia Reutzel
- Justin Frame
- Heather Sallan
- Christine Caria
- Emily Cantrell
- Tammy Davis
- Mariah Arline
- Miranda Jessen
- Allison Theno
- Mindy Ritter
- Bersabe Pineda
- Mark Smith
- Matthew Beatty
- Alicia Beatty
- Elizabeth Beatty
- Cheryl McPherson
- Shanna Caputo
- Angel Handlin
- Darrel Handlin
- Jen Holub
- Mark Boden
- Joy Boden
- Emily Boden
- Dylan Boden
- Maddison Boden
- Elijah Pacheco
- Taylor Winston
- Taylor Dombrovski
- Ralph Reyes
- Kristinna Reyes
- Ben Carey
- Somer Martinez

- Tony Martinez
- Joseph Cole
- Regina Green
- Jeff Wright
- Shay Wright
- Steven Toomey





4101 Meadows Lane #100 | Las Vegas, NV 89107  
Tel. 702.655.2346 | Fax 702.655.3763 | claggettlaw.com

April 16, 2018

VIA U.S. MAIL

Michael Doyen, Esq.  
**Munger, Tolles & Olson, LLP**  
350 South Grand Avenue, 50<sup>th</sup> Floor  
Los Angeles, CA 90071-3426

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

Dear Michael Doyen, Esq.:

Please be advised that the following individuals are represented by Claggett & Sykes Law Firm regarding the events arising out of the October 1, 2017 shooting:

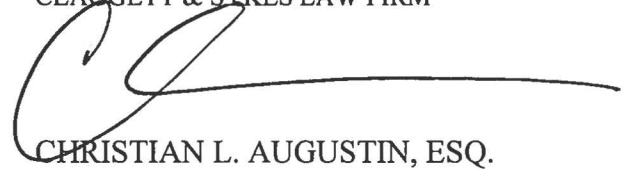
Lyndsay Fisher  
Matthew Fox  
Christian Hughes  
Jamie Calvillo  
Treza Mekhail  
Heather Kerr

As counselor for the claimants listed above, we request that all future correspondence or communications be directed to my attention at the following address:

**Claggett & Sykes Law Firm**  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
(702) 655-2346 Telephone  
(702) 655-3763 Facsimile  
[caugustin@claggettlaw.com](mailto:caugustin@claggettlaw.com)

Effective immediately MGM Resorts International Inc., Mandalay Corporation, or any of their affiliated entities, should not contact our clients by mail (postal or electronic), phone, or otherwise. Thank you for your anticipated cooperation in this matter.

Sincerely,  
CLAGGETT & SYKES LAW FIRM

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line that extends to the right and then curves back down to the baseline.

CHRISTIAN L. AUGUSTIN, ESQ.



**BRAUN & BRAUN LLP**

10250 CONSTELLATION BOULEVARD, SUITE 1020

LOS ANGELES, CALIFORNIA 90067

TELEPHONE: (310) 277-4777

FACSIMILE: (310) 507-0232

May 23, 2018

VIA U.S. MAIL

Brad D. Brian, Esq.  
Munger, Tolles & Olson LLP  
350 South Grand Ave.  
Los Angeles, CA 90071

Richard J. Doren, Esq.  
Gibson Dunn & Crutcher LLP  
333 South Grand Avenue  
Los Angeles, CA 90071

Michael Schonbuch, Esq.  
Daniels, Fine, Israel, Schonbuch & Lebovits  
1801 Century Park East 9<sup>th</sup> Floor  
Los Angeles, CA 90067

Wendy Wilcox, Esq.  
Skane Wilcox  
1055 West 7<sup>th</sup> Street Suite 1700  
Los Angeles, CA 90017

Richard J. Schneider, Esq.  
Daley & Heft LLP  
462 Stevens Ave, Suite 201  
Solana Beach, CA 92075

**Re: Las Vegas Shooting Litigation – Notice of Representation of Clients**

Counsel,

LLP: Please be advised that the following individuals are represented by Braun & Braun

1. Keith Mineo
2. Jessica Davies

We ask that you refrain from contacting our clients in-person, by mail, by e-mail, by phone, or otherwise. All future correspondence and communications should be directed to:

Adam H. Braun, Esq.  
BRAUN & BRAUN LLP  
10250 Constellation Blvd. Suite 1020  
Los Angeles, CA 90067  
T: (310)277-4777  
F: (310)507-0232  
[adam@braunlaw.com](mailto:adam@braunlaw.com)

Brad D. Brian, Esq.

Richard J. Doren, Esq.

Michael Schonbuch, Esq.

Wendy Wilcox, Esq.

Richard J. Schneider, Esq.

Re: Las Vegas Shooting Litigation – Notice of Representation of Clients

May 23, 2018

Page 2

Thank you for your cooperation in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adam H. Braun', with a stylized flourish at the end.

ADAM H. BRAUN  
Attorneys for Keith Mineo  
and Jessica Davies

**BRAUN & BRAUN LLP**

10250 CONSTELLATION BOULEVARD, SUITE 1020

LOS ANGELES, CALIFORNIA 90067

TELEPHONE: (310) 277-4777

FACSIMILE: (310) 507-0232

May 23, 2018

VIA U.S. MAIL

Brad D. Brian, Esq.  
Munger, Tolles & Olson LLP  
350 South Grand Ave.  
Los Angeles, CA 90071

Richard J. Doren, Esq.  
Gibson Dunn & Crutcher LLP  
333 South Grand Avenue  
Los Angeles, CA 90071

Michael Schonbuch, Esq.  
Daniels, Fine, Israel, Schonbuch & Lebovits  
1801 Century Park East 9<sup>th</sup> Floor  
Los Angeles, CA 90067

Wendy Wilcox, Esq.  
Skane Wilcox  
1055 West 7<sup>th</sup> Street Suite 1700  
Los Angeles, CA 90017

Richard J. Schneider, Esq.  
Daley & Heft LLP  
462 Stevens Ave, Suite 201  
Solana Beach, CA 92075

**Re: Las Vegas Shooting Litigation – Notice of Representation of Clients**

Counsel,

Please be advised that the following individuals are represented by Braun & Braun LLP:

1. Justin Galvan
2. Roman Galvan
3. Paisley Galvan
4. Paxton Galvan

We ask that you refrain from contacting our clients in-person, by mail, by e-mail, by phone, or otherwise. All future correspondence and communications should be directed to:

Adam H. Braun, Esq.  
BRAUN & BRAUN LLP  
10250 Constellation Blvd. Suite 1020  
Los Angeles, CA 90067  
T: (310)277-4777  
F: (310)507-0232  
[adam@braunlaw.com](mailto:adam@braunlaw.com)

Brad D. Brian, Esq.

Richard J. Doren, Esq.

Michael Schonbuch, Esq.

Wendy Wilcox, Esq.

Richard J. Schneider, Esq.


Re: Las Vegas Shooting Litigation – Notice of Representation of Clients

May 23, 2018

Page 2

Thank you for your cooperation in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adam H. Braun', with a stylized flourish at the end.

ADAM H. BRAUN  
Attorneys for Justin Galvan,  
Roman Galvan, Paisley Galvan,  
and Paxton Galvan

*Robert B. Sidell*

*Attorney at Law*

*3415 West Charleston Blvd., Las Vegas, Nevada 89102*

*Telephone (702) 384-3847, Fax (702) 309-2999*

*Licensed in Nevada, California and Arizona*

Saturday, November 18, 2017

Via Email: michael.doyen@mto.com

**ATTN: Mr. Michael Doyen, Esq.**

Munger, Tolles & Olson LLP  
350 S Grand Ave  
Los Angeles, CA 90071

Your Insured: Mandalay Bay / MGM Resorts International

Our Client: Thomas Gunderson

Date of Loss: 10/1/2017

Dear Administrator:

We have been retained by Thomas Gunderson in connection with the shooting that occurred on the above date.

Also, to save you the need to request this information, required by Section III of the Medicare, Medicaid and Schip Extension act of 2007, we are hereby providing the full name, date of birth, social security number, and gender of our client:

Full Name: Thomas Gunderson

Date of Birth: 5/13/1989

Social Security Number: xxx-xx-3140

Gender: Male

Please direct all further communication to our office in connection with this accident. We request that you advise our office immediately if there is any question concerning coverage, or liability.

Thank you for your anticipated cooperation.

Very truly yours,

Robert B. Sidell

RBS:rhs

cc: Thomas Gunderson



Glen J. Lerner, Esq.\*  
Corey M. Eschweiler \*  
Justin G. Randall \*\*†  
Craig A. Henderson \*\*

# GLEN LERNER

## INJURY ATTORNEYS

\* = Only Licensed in NV  
\*\* = Also Licensed in NV  
† = Also Licensed in AZ

January 12, 2018

**CERTIFIED AND REGULAR MAIL**  
**RETURN RECEIPT REQUESTED**  
**7016 2140 0000 1909 4152**

Luxor Las Vegas  
3900 S Las Vegas Blvd  
Las Vegas, NV 89119

RE: Incident on October 1, 2017

To Whom It May Concern:

With respect to the above-referenced matter, please be advised that this office represents our client, April L. Hagen, in a claim for personal injuries arising from this accident. Our investigation reveals that you are responsible for the accident and as such are liable to our client for injuries and damages sustained.

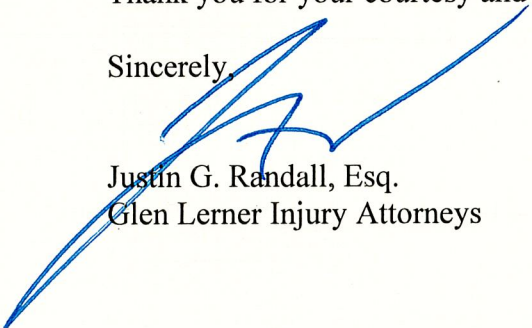
**It is imperative that you provide this office with information as to the identity of your insurance carrier and policy number without delay so that this matter may be concluded in timely fashion and the necessity of litigation with its attendant expense is obviated.**

Further, this letter shall constitute notice of a potential legal claim. You have a duty to preserve any and all evidence including but not limited to information, video tapes, witness statements, audio tapes, and all physical evidence such as automobiles, defective products or parts, and any other tangible item involved in or contributing to the cause of the accident. Your failure to preserve – or your willful destruction of – such evidence can be considered spoliation of evidence, and may result in sanctions against you.

I shall calendar this matter for SEVEN (7) days of receipt of this letter. If at that time we have not heard from you, we will be forced to name you directly in a lawsuit arising from the aforementioned facts.

Thank you for your courtesy and cooperation.

Sincerely,



Justin G. Randall, Esq.  
Glen Lerner Injury Attorneys

RE: April L. Hagen  
Matter No.: 18102924CA

Please return to:  
**Mike Groseclose**  
**Glen J. Lerner & Associates**  
**8872 Sunset Boulevard**  
**West Hollywood, CA 90069**

Insurance Company: \_\_\_\_\_

Policy Number: \_\_\_\_\_

Claim Number: \_\_\_\_\_

Adjuster: \_\_\_\_\_

Name of Insured: \_\_\_\_\_

Insurance Company Phone Number: \_\_\_\_\_

# NURENBERG □ PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

November 16, 2017

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE:	My Client:	Martin Hathcock
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80535

Dear Sir/Madam:

Please be advised that this office has been retained to represent Martin Hathcock for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,

Jordan D. Lebovitz

JDL/ep



# NURENBERG □ PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

November 16, 2017

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE:	My Client:	Carly Henschel
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80510

Dear Sir/Madam:

Please be advised that this office has been retained to represent Carly Henschel for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,

  
Jordan D. Lebovitz

JDL/ep



April 12, 2018

*Via Electronic Correspondence & U.S. Mail Only*

**Mr. Michael R. Doyen**  
**Munger, Tolles & Olson LLP**  
**350 South Grand Avenue, 50th Floor**  
**Los Angeles, CA 90071-3426**  
**Michael.Doyen@mto.com**

**RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities**

Dear Mr. Doyen:

Please be advised that the individuals listed in Exhibit A attached hereto are represented by Litt Law Firm, LLC. As counselors for the claimants listed in Exhibit A, we request that all future correspondence or communications be directed to our attention at the following address:

Richard L. Litt, M.D., ESQ.  
Amanda E. Litt, ESQ.  
Litt Law Firm, LLC  
3202 West Charleston Blvd.  
Las Vegas, NV 89102

Emails: [flyer96555@hotmail.com](mailto:flyer96555@hotmail.com) (Richard Litt, MD, ESQ.)  
[aelitt@littlawfirm.com](mailto:aelitt@littlawfirm.com) (Amanda E. Litt, ESQ.)

Phone: (702) 888-9298 Fax: 1-702-447-2202



3202 West Charleston Boulevard  
Las Vegas, Nevada 89102



Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should not contact our clients by mail (postal or electronic), phone, or otherwise. Thank you for your anticipated cooperation in this matter.

Sincerely yours,

Amanda E. Litt, Esq.  
Founder/Managing Partner  
Litt Law Firm LLC



3202 West Charleston Boulevard  
Las Vegas, Nevada 89102



**EXHIBIT A**

1. DIANE HILL  
DOB: May 21, 1956  
Address: 669 LaCosta Drive  
Banning, CA 9220
  
2. NATALIE ANDERSON  
DOB: 11/05/90  
Address: 1808 Piedmont  
Irvine, CA 92620
  
3. ALETHA ANDERSON  
Address: PO Box 2845,  
Blue Jay, CA 92317



3202 West Charleston Boulevard  
Las Vegas, Nevada 89102

# TURNER | MODARELLI

BRIAN H. TURNER  
ADMITTED IN CA  
BRIAN@TMODLAW.COM

ANTHONY C. MODARELLI  
ADMITTED IN CA & NV  
ANTHONY@TMODLAW.COM

---

ORANGE COUNTY  
5000 BIRCH ST., STE. 3000  
NEWPORT BEACH, CA 92660  
P: 949.610.0855

SACRAMENTO  
2018 X ST.  
SACRAMENTO, CA 95818  
P: 916.229.8800

LAS VEGAS  
415 S. 6TH ST., STE. 300  
LAS VEGAS, NV 89101  
P: 702.466.1492

F: 866.833.5594  
WWW.TMODLAW.COM

April 11, 2018

**Via US Mail and Email**

Michael R. Doyen, Esq.  
Munger, Tolles & Olson LLP  
350 South Grand Ave., 50<sup>th</sup> Floor  
Los Angeles, CA 90071  
E: Michael.Doyen@mto.com

**RE: Mandalay Bay and Route 91 Concert Shooting**  
OUR CLIENTS: Amber Holm and William Wieger  
YOUR CLIENTS: MGM Resorts International, Mandalay Bay Corporation, and all related entities

Dear Mr. Doyen

Please be advised that our firm has been retained by Amber Holm and William Wieger to represent them in connection with their claims for damages resulting from injuries sustained during the shooting which occurred at the Route 91 Concert on October 1, 2017. It is our understanding that you and your firm have been retained to represent the above-identified clients.

Effective immediately, MGM Resorts International, Inc., Mandalay Bay Corporation, or any of their affiliated entities or representatives should not contact our clients by any means. Please direct all future correspondence or communications to our attention at the following address:

Anthony C. Modarelli  
Turner & Modarelli, PC  
415 S. 6<sup>th</sup> St., Suite 300  
Las Vegas, NV 89101  
P: (702) 466-1492  
F: (866) 833-5594  
E: anthony@tmodlaw.com

Thank you for your anticipated cooperation in this matter.

TURNER | MODARELLI  
  
ANTHONY MODARELLI

# NURENBERG $\square$ PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

November 16, 2017

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE:	My Client:	Briana Joseph
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80534

Dear Sir/Madam:

Please be advised that this office has been retained to represent Briana Joseph for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,

  
Jordan D. Lebovitz

JDL/ep

DAVID D. DICKEY  
RALPH L. GONZALEZ  
HEATHER N. BARNES  
C. STEVEN YERRID



BOARD CERTIFIED CIVIL  
TRIAL LAWYER  
ALSO ADMITTED  
IN VIRGINIA  
ALSO ADMITTED IN  
WASHINGTON, D.C.

October 24, 2017

**SENT VIA CERTIFIED REGULAR U.S. MAIL**

MGM Resorts International  
3600 Las Vegas Blvd. South  
Las Vegas, NV 89109

Re: *Mr. and Mrs. Kammer*  
Date of Injury: October 1, 2017

Dear Sir/Madam:

Please be advised our firm has been contacted to fully investigate the injuries sustained by Mr. and Mrs. Kammer on October 1, 2017. This correspondence is provided to place MGM Resorts International on notice not to destroy, purge, or otherwise dispose of any documents, records, electronic information, video, photographs, or other data that in any way pertains to the shooting, including, but not limited to, the video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance; the names and contact information of all persons with personal knowledge; as well as the personnel files and training records of any persons involved, including Jose Campos, or any person with supervisory responsibility. We also request that any information contained on personal recording devices (cameras, cell phones, etc.) owned or used by MGM Resorts International is likewise preserved. In the event any such documents, objects, data, or information is lost destroyed, purged, or otherwise disposed of, we will seek all available remedies including claims for spoliation of evidence or adverse inference evidentiary instructions.

We request MGM Resorts International cooperate with our investigation by providing any information it would like to share with Mr. and Mrs. Kammer. We specifically request copies of all video surveillance, photographs, or other depictions of the incident.

BANK OF AMERICA PLAZA, STE 3910  
101 EAST KENNEDY BOULEVARD  
TAMPA, FLORIDA 33602-5192  
T: 813.222.8222 F: 813.222.8224  
WWW.YERRIDLAW.COM

*MGM Resorts International*  
*Page 2 of 2*

Please provide within (thirty) 30 days of this request the following information for all potential insurance policies that may provide coverage for claims arising from this incident, including excess coverage:

- The name of the insurer;
- The name of each insured;
- The limits of the liability coverage;
- A statement of any policy coverage defense which such insurer reasonably believes is available to such insurer at the time of filing such statement; and
- A copy of the policy.

We trust you will cooperate with our investigation. Please contact us if you would like to discuss the injuries sustained by our clients, our preservation request, and our request for information.

Thank you for your consideration and prompt attention to this request.

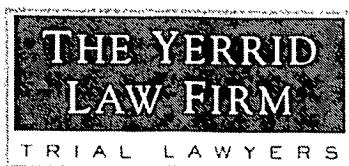
Sincerely,



Heather N. Barnes  
For the Firm



DAVID D. DICKEY  
RALPH L. GONZALEZ  
HEATHER N. BARNES  
C. STEVEN YERRID



BOARD CERTIFIED CIVIL  
TRIAL LAWYER  
ALSO ADMITTED  
IN VIRGINIA  
ALSO ADMITTED IN  
WASHINGTON, D.C.

October 24, 2017

**SENT VIA CERTIFIED REGULAR U.S. MAIL**

Mandalay Corp., d/b/a Mandalay Bay Resort and Casino  
3950 Las Vegas Blvd. South  
Las Vegas, NV 89119

Re: *Mr. and Mrs. Kammer*  
Date of Injury: October 1, 2017

Dear Sir/Madam:

Please be advised our firm has been contacted to fully investigate the injuries sustained by Mr. and Mrs. Kammer on October 1, 2017. This correspondence is provided to place Mandalay Corp., d/b/a Mandalay Bay Resort and Casino on notice not to destroy, purge, or otherwise dispose of any documents, records, electronic information, video, photographs, or other data that in any way pertains to the shooting, including, but not limited to, the video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance; the names and contact information of all persons with personal knowledge; as well as the personnel files and training records of any persons involved, including Jose Campos, or any person with supervisory responsibility. We also request that any information contained on personal recording devices (cameras, cell phones, etc.) owned or used by MGM Resorts International is likewise preserved. In the event any such documents, objects, data, or information is lost destroyed, purged, or otherwise disposed of, we will seek all available remedies including claims for spoliation of evidence or adverse inference evidentiary instructions.

We request Mandalay Corp., d/b/a Mandalay Bay Resort and Casino cooperate with our investigation by providing any information it would like to share with Mr. and Mrs. Kammer. We specifically request copies of all video surveillance, photographs, or other depictions of the incident.

BANK OF AMERICA PLAZA, STE 3910  
101 EAST KENNEDY BOULEVARD  
TAMPA, FLORIDA 33602-5192  
T 813.222.8222 F 813.222.8224

*Mandalay Corp., d/b/a Mandalay Bay Resort and Casino*  
*Page 2 of 2*

Please provide within (thirty) 30 days of this request the following information for all potential insurance policies that may provide coverage for claims arising from this incident, including excess coverage:

- The name of the insurer;
- The name of each insured;
- The limits of the liability coverage;
- A statement of any policy coverage defense which such insurer reasonably believes is available to such insurer at the time of filing such statement; and
- A copy of the policy.

We trust you will cooperate with our investigation. Please contact us if you would like to discuss the injuries sustained by our clients, our preservation request, and our request for information.

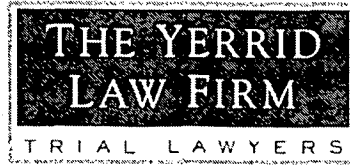
Thank you for your consideration and prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather N. Barnes", with a long horizontal flourish extending to the right.

Heather N. Barnes  
For the Firm

DAVID D. DICKEY  
RALPH L. GONZALEZ  
HEATHER N. BARNES  
C. STEVEN YERRID



BOARD CERTIFIED CIVIL  
TRIAL LAWYER  
ALSO ADMITTED  
IN VIRGINIA  
ALSO ADMITTED IN  
WASHINGTON, D.C.

October 26, 2017

**SENT VIA CERTIFIED REGULAR U.S. MAIL**

Mandalay Corp., d/b/a Mandalay Bay Resort and Casino  
3950 Las Vegas Blvd. South  
Las Vegas, NV 89119

Re: *Mr. and Mrs. Kammer*  
Date of Injury: October 1, 2017

Dear Sir/Madam:

Please be advised our firm has been contacted to fully investigate the injuries sustained by Mr. and Mrs. Kammer on October 1, 2017. This correspondence is provided to place Mandalay Corp., d/b/a Mandalay Bay Resort and Casino on notice not to destroy, purge, or otherwise dispose of any documents, records, electronic information, video, photographs, or any other data for the period beginning September 28, 2017 through October 2, 2017, including, but not limited to, the video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance; the names and contact information of all persons with personal knowledge; as well as the personnel files and training records of any persons involved, including Jose Campos, or any person with supervisory responsibility. We also request that any information contained on personal recording devices (cameras, cell phones, etc.) owned or used by Mandalay Corp., d/b/a Mandalay Bay Resort and Casino is likewise preserved. In the event any such documents, objects, data, or information is lost destroyed, purged, or otherwise disposed of, we will seek all available remedies including claims for spoliation of evidence or adverse inference evidentiary instructions.

We request MGM Resorts International retain any documents, records, electronic information, video, photographs, or any other data that in any way pertains to Stephen Paddock for the three year period prior to October 2, 2017, including, but not limited to, video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance.

BANK OF AMERICA PLAZA, STE 3010  
101 EAST KENNEDY BOULEVARD  
TAMPA, FLORIDA 33602-5192  
T: 813.222.8222 F: 813.222.8224

*MGM Resorts International*  
*Page 2 of 2*

We further request Mandalay Corp., d/b/a Mandalay Bay Resort and Casino cooperate with our investigation by providing any information it would like to share with Mr. and Mrs. Kammer. We specifically request copies of all video surveillance, photographs, or other depictions of Stephen Paddock from September 28, 2017, through October 2, 2017.

We trust you will cooperate with our investigation. Please contact us if you would like to discuss the injuries sustained by our clients, our preservation request, and our request for information.

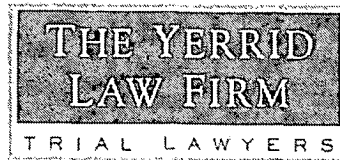
Thank you for your consideration and prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather N. Barnes", with a stylized flourish at the end.

Heather N. Barnes  
For the Firm

DAVID D. DICKEY  
RALPH L. GONZALEZ  
HEATHER N. BARNES  
C. STEVEN YERRID



BOARD CERTIFIED CIVIL  
TRIAL LAWYER  
ALSO ADMITTED  
IN VIRGINIA  
ALSO ADMITTED IN  
WASHINGTON, D.C.

October 24, 2017

**SENT VIA CERTIFIED REGULAR U.S. MAIL**

MGM Resorts International  
3600 Las Vegas Blvd. South  
Las Vegas, NV 89109

Re: *Mr. and Mrs. Kammer*  
Date of Injury: October 1, 2017

Dear Sir/Madam:

Please be advised our firm has been contacted to fully investigate the injuries sustained by Mr. and Mrs. Kammer on October 1, 2017. This correspondence is provided to place MGM Resorts International on notice not to destroy, purge, or otherwise dispose of any documents, records, electronic information, video, photographs, or other data that in any way pertains to the shooting, including, but not limited to, the video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance; the names and contact information of all persons with personal knowledge; as well as the personnel files and training records of any persons involved, including Jose Campos, or any person with supervisory responsibility. We also request that any information contained on personal recording devices (cameras, cell phones, etc.) owned or used by MGM Resorts International is likewise preserved. In the event any such documents, objects, data, or information is lost destroyed, purged, or otherwise disposed of, we will seek all available remedies including claims for spoliation of evidence or adverse inference evidentiary instructions.

We request MGM Resorts International cooperate with our investigation by providing any information it would like to share with Mr. and Mrs. Kammer. We specifically request copies of all video surveillance, photographs, or other depictions of the incident.

BANK OF AMERICA PLAZA, STE 3910  
101 EAST KENNEDY BOULEVARD  
TAMPA, FLORIDA 33602-5102  
T: 813.222.8222 F: 813.222.8224

*MGM Resorts International*  
*Page 2 of 2*

Please provide within (thirty) 30 days of this request the following information for all potential insurance policies that may provide coverage for claims arising from this incident, including excess coverage:

- The name of the insurer;
- The name of each insured;
- The limits of the liability coverage;
- A statement of any policy coverage defense which such insurer reasonably believes is available to such insurer at the time of filing such statement; and
- A copy of the policy.

We trust you will cooperate with our investigation. Please contact us if you would like to discuss the injuries sustained by our clients, our preservation request, and our request for information.

Thank you for your consideration and prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Heather N. Barnes', written in a cursive style.

Heather N. Barnes  
For the Firm

DAVID D. DICKEY  
RALPH L. GONZALEZ  
HEATHER N. BARNES  
C. STEVEN YERRID



BOARD CERTIFIED CIVIL  
TRIAL LAWYER  
ALSO ADMITTED  
IN VIRGINIA  
ALSO ADMITTED IN  
WASHINGTON, D.C.

October 26, 2017

SENT VIA CERTIFIED REGULAR U.S. MAIL

MGM Resorts International  
3600 Las Vegas Blvd. South  
Las Vegas, NV 89109

Re: *Mr. and Mrs. Kammer*  
Date of Injury: October 1, 2017

Dear Sir/Madam:

Please be advised our firm has been contacted to fully investigate the injuries sustained by Mr. and Mrs. Kammer on October 1, 2017. This correspondence is provided to place MGM Resorts International on notice not to destroy, purge, or otherwise dispose of any documents, records, electronic information, video, photographs, or any other data for the period beginning September 28, 2017 through October 2, 2017, including, but not limited to, the video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance; the names and contact information of all persons with personal knowledge; as well as the personnel files and training records of any persons involved, including Jose Campos, or any person with supervisory responsibility. We also request that any information contained on personal recording devices (cameras, cell phones, etc.) owned or used by MGM Resorts International is likewise preserved. In the event any such documents, objects, data, or information is lost destroyed, purged, or otherwise disposed of, we will seek all available remedies including claims for spoliation of evidence or adverse inference evidentiary instructions.

We request MGM Resorts International retain any documents, records, electronic information, video, photographs, or any other data that in any way pertains to Stephen Paddock for the three year period prior to October 2, 2017, including, but not limited to, video surveillance of the entire premises of Mandalay Bay, including the valet area, the parking lot, the elevator banks, the fire escape, the hallways of the hotel, the casino areas, and any and all other areas with video surveillance.

BANK OF AMERICA PLAZA, STE 3910  
101 EAST KENNEDY BOULEVARD  
TAMPA, FLORIDA 33602-5192  
T: 813.222.8222 F: 813.222.8224

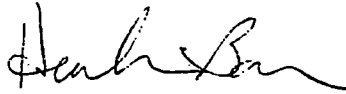
*MGM Resorts International*  
*Page 2 of 2*

We further request MGM Resorts International cooperate with our investigation by providing any information it would like to share with Mr. and Mrs. Kammer. We specifically request copies of all video surveillance, photographs, or other depictions of Stephen Paddock from September 28, 2017, through October 2, 2017.

We trust you will cooperate with our investigation. Please contact us if you would like to discuss the injuries sustained by our clients, our preservation request, and our request for information.

Thank you for your consideration and prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Barnes", with a stylized flourish at the end.

Heather N. Barnes  
For the Firm



April 16, 2018

**VIA Electronic Mail**

Mr. Michael R. Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
[Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

Dear Mr. Doyen:

Please be advised that the individuals listed in Exhibit A attached hereto are represented by Robinson Calcagnie, The Law Offices of A. Craig Eiland, P.C. and Lee Murphy Law Firm. Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should have no contact with our clients by mail (postal or electronic), phone, social media or otherwise.

As counsel for the claimants listed in Exhibit A, we request that all future correspondence or communications be directed to our attention at the addresses listed below. Thank you for your anticipated cooperation in this matter.

Sincerely yours,

*/s/ Mark P. Robinson, Jr*

---

Mark P. Robinson, Jr.  
Robinson Calcagnie, Inc.  
19 Corporate Plaza Drive  
Newport Beach, CA 92660  
Tel: (949)720-1288  
Fax: (949) 720-1292  
[mrobinson@robinsonfirm.com](mailto:mrobinson@robinsonfirm.com)  
[www.robinsonfirm.com](http://www.robinsonfirm.com)



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A. Craig Eiland  
Law Offices of A. Craig Eiland  
1220 Colorado St., Suite 300  
Austin, TX 78701  
Tel: 512-482-3260  
Fax: 713-513-5211  
[CEiland@EilandLaw.com](mailto:CEiland@EilandLaw.com)

*/s/ James Lee, Jr.*

---

James Lee, Jr.  
Lee Murphy Law Firm  
2402 Dunlavy Street, Suite 200  
Houston, TX 77006  
Tel: 713-275-6990  
Fax: 713-583-5586  
[JLee@LeeMurphyLaw.com](mailto:JLee@LeeMurphyLaw.com)

**EXHIBIT A**

Full Name
Autum Kapinkin
Trina Andrade-Kwist
Karen Berney
Deborah Urrizaga
Teresa DeLeon Hill
Steven Martin
Nickee Branham-Skoff
Anna Kopp
Todd Tomlin
April Gabany
Steven Sonnenburg
Juan Cuellar
Neesha B Wolfe
Brandon Kalaaukahi
Rachel Sheppard
Autumn Christiano White
Jocelyn Brady
Tyler Craig
Alaina Kelly
Wanda Grage Weinrich
Evan Tillema
Debra Kelly
William Kelly
Serena West
Carley Cass
Chanell Cuellar
Kathleen Conti
Alison Sheehe
Evan Feinberg
Jamie Zaleski
alison
Hannah Logan
Carrie Allmen Bradshaw
Kelly Jo Hiebert
Jolene Barcus
Sue Ann Cornwell
Joe Adkins
Laura Zarate
James M. Pelz
Eugene Shavers
Jacquelyn Hoffing
Sandra Villalba
Cody Rash
Kash Knudson
Derrick Elliott
Lindsay Tillema

Eric Higgins
Elizabeth Hefley
Britin Hughes
Brian Ahlers
Denise McClellan
Michelle Elaine Spencer
Amanda Sambrano
Stephan Sambrano
Ashlie Guerrero
Cindy Vandyke
Janae Sambrano
Jeffery Sambrano
Michael Sambrano
Miguel Guerrero
Wendy Everett
Gabriela Guzman
Kendall Quiroz
Stanley Rendon
Carmen McKinley
Eden Smith
Elizabeth McNeil
Mirta Katnich
Lynzee Campbell
Brenda Arce
Ana Nunez
Lindsay Okray
Daniel Abrams
Luis Nunez
Andrea Abrams
Daniel Best
Christopher Caywood
Kasandra Caywood
John Bui
Sarah Tiscareno
Leticia Luna
Leanne Altamirano
Amanda Wechlser
Justine Salas
Rafael Feliciano
Jasara Requejo
Kendra Hobbs
Melinda Hawkins
Lisa Holguin
Albert Holguin
Jesse Alas Garcia
Mavis Barnette
Rhonda Trask

Randell Christensen
Kristi Christensen
Kevin Gadd
Vanessa Case
Joseph Balas
Magee Segal
Linda Liewsuwanphong
Teresa Garcia
Susan Learn
Patricia Campbell
Duane Dubbs III
Lillian Aguirre
Harry Romero
Claudia Romero
Hamida Trujillo
James Williamson
Erik Zaluske
Susan Himes
Jerry Speraw
Teresa Marquez
Stella Walz
Roger Mozda
Brenda Crane
Shannon Balas
Amanda Frost
Irene Scharmack
Sharla Zotea
Jennifer Campbell
Ernesto Espinoza
Erica Ramos
Kim Schmitz
Naomi Webb (minor)
Riley Musgrave
Bernadette Rocha
Mindy Foster
Elizabeth Carvalho
Frank Nicassio
Grace Nicassio
Marlana Foltz
Heather Tole Rivera
Kristine Henderson
Larry Hayden
Elizabeth Moreno
Lori A. Young
Maryssa Fields
Morgan Virus
Rebecca Kenoyer

Sharmen Badua-Murray
Sierra Donnelly
Lori Krumme
Carissa Rash
Holly Mayes
Lea Richmond
Keri Cesario
Cassandra Molenda o/b/o Brett Schwanbeck
Janet Seeger
Amanda Bobb
Brenda Kent
Stephanie Gallegos
Laura Puglia
Krystal Nash
Bryan Hoffrichter
Bradley Hoffrichter
Gabriel Guerrero
Raymond Rivera
Johanna Duncan
Jade Wright
Matthew Duncan
Laurie Manis
Gregory Manis
Leticia Cannon
Alicia Olive
Macey Balas
Pridee Liewsuwanphong
Trisha Guerrero
Thomas Scott Jacobus
Dawni Corbin
Taylor Hill
Barry Corbin
Anthony Cresta
Meghan Belmares
Jeanette Nugent
Martin Bangma
Jeff Hines
Nicole Bontempo
Judith (Judy) Leyn
Annalise Belmares
Billy Jones
Michael Henderson
Kendal Balas
Kylie Panno
Marissa Currie
Victoria Salas
Roberta Newton

Megan Meredith
Robyn-Lee Wolchyn
Brendan Hoolihan
Denise Gonzalez
Armando Solis Jr.
Leslie Paiz
Alex Alvarez
Randall Webb
Christiann Meyer and Wayne Meyer
Shauntay E. Taylor
Jimmy Gilmore
Tammy Hiscox Gurule
Harry and Kitty Salmon
Jeffrey Holden
Danielle Delira
Stacie Owens
Joseph Agosta III
Connie Manning
Robert Eardley
David Floen
Marco Albertini
Courtney Mayo
Joe Shipp
Bryan Matthews
Cynthia Agosta
Jillian Elliott
Craig Fine
Teresa Jensen
Timothy Robinson
Ligia Uriarte
Erin Gill
Tamara Delameter
Amber Rench Wetzel
Christopher Wetzel
Tonia Rocheleau
Rina Williamson
Tina Bedartes
Kyle R. David
Steve A. Moreno
Troy O. Zeeman
Lisa DiRado-Moreno
Michael Ljubic
Michelle Ljubic
Kelly Yeakel
Brett Yeakel
Armand Smith
Renee Jimenez

Brittany Lynn Quintero
Saul Rodriguez
Leah Loewenthal
Shannon Zeeman
Ali Ellis
Kassandra Kopp
Jason Ford
Jessica Ford
Shandi Strong
Veronica Chavez
Eric J. Nobriga Sr
Brandon Young
Jason Parsons
Matthew Allen Carrillo
carmen mck
Jennifer Gibson
Katherine Gonzales
Steve Stewart
Anne Krieghoff
Daniel Paiz
Johnathan Medina
Jose Uriarte
Jon Gurule
Corey Shipp
Joyce Shipp
Donna Holden
Steve Hutchason
Kyle D. Taylor
Kimberly Gutierrez
Stephanie Smarker
Anna Williams
Salvador Martinez
Elizabeth Glascom
Joanna Alvarez
Ryan Dieringer
Graciela Rebollar
Renee Oliver
Philip Loncar
Regina R. Martinez
David Scharmack
Greg Cluff
Marissa LaCarrubba
Michael Robertson
Nicholas Lawlor
Brenden Araujo
Alyssa Padilla
Chris W. Murray

Tristi Glover
Christy Gilman
Jaycee V. Ringle
Jennifer Funk
Joseph Napoli
Anne Murphy
Aliza Correa
Joseph Funk
Nicholas Swartz
Jim Boyle
Raquel Rooks
Jennifer Beddia
Regina Dieringer
Christina Garcia
Melinda Brockie
Brian Kettering
Tammy J. Chambers
John Hefley
Mariya Toro
Arla Loncar
Blake Loncar
Amy Filleman
Veronica Statter
David Statter
Brooke Magorien
Yvonne Lee
Donna Coleen Sears
Kevin Sears
Shawna York
Emily Dimon
Mia Mumford
Shayna Shackleford
David Fluker
Corey Henderson
Hannah Dominguez
Jason Davis
Lauren Chagolla
Taylor Collins
Haley Sisneros
Lacy Gann
Shawn Washburn
Brandon Wharton
Armando Hernandez Jr.
Arlen Hernandez
Michelle Jones
Melody Buckens
Gene Simpson Jr.



Armando Hernandez Sr.
Debra Mitchell
Randy Garcia
Douglas Johnston
Patricia Johnston
William Shearer
Tiffany Charan
Aliyah Howard
Thomas Martin
Kayla Mills
Sydney Shaver
Adrianna Culler
Rosa Miranda
Robert Aguilar
Debra Hudson
Donna Jean Adcock
Yvette Kettering
Doreen Gorman
William Jones
Mandi Harris
Debra Reliford
Nicole Desaracho
Christa Conway
Johnny Toscano
Tiffani Lawyer
Stephanie McKiernan
Martin L. Landers
Alesha Gonzalez
Brittany Hopkins
Sally Palmer
Nancy L. Feyma
Melissa Palumbo
Michael Gonzalez
Teri Williams Pacheco
Juan Juarez
Amoreya Rollins
Tiffany McCellan
Jaja Triplett
Traivona Stapleton
Erika Giesecke
Jonathan Dundee Hutchinson
Chelsea Laurent
Gena Elfelt
Nikole Williams
Sammiesha Johnson
Eric Rymer
Joshua Wrzesinsk

Connor Casarez
Laterrius D. Peters
Kimberly A. Downes
Tanya Banuelos
Joe M. Quinteros
Renee Duran
Austin Christiansen
Robert Di Nonno
Charleen Fassino
Nicole Schubert
Justin Simmons
Lawrence Raybuck
Oscar Rapio
Neptali Paredes-Figueroa
Michael Ogazon
Jesus Mata
Miguel Lagos
Fernando Hernandez
Sheela Henry
Michael Hansson
Manuel Cigarroa
Jeff Sandwell
Aleshia Dixon
Rocky Palermo
Tyler Hill
Farrah Angelic
Stanley Williams
CM Powell
Richard Espinoza II
Ashley Becker
Samanta Arjune
Tamara J. Stewart
Sandra Venables
Tijuana Edwards
Coryne Lippert
Albert Higgins Sr.
Deborah Higgins
Elsa Nunez
Albernisha Thomas
Dana Getreu
Riley S. Murray
Rudolph Roquemore
Corinne Lomas
Krystalyn Desoto
Joseph N. Williams
Jasmine Barbusca
Paula Blakeley

Staci Ellis
Austin Fisher
Kelcy Maio
Christopher Lowman
Kate Carlin
Holly E. Santino
Jennifer Fluegal
Timothy Echavarria
Gina Richard
Shawna Wood
Jennifer Grimm
Elaine Silvestre
Kylie Mulcahy
Anthony Wood
Ricardo Uribe
Pamela A. Lekavich
Rosie Amatulli
Athea Lavin
Adam Matz
Sandy Tatelman
Michael Edwards
Elizabeth E. Carpenter
Laura Acree
Chad Packard
Alyssa Sands
Jeremy Scott Hicks
Jonathan Sloniger
Katie Stern
Robert Watkins
Arturo Rodriguez
Gustavo Orosco
Albert Higgins Jr.
Lisa Furman
Yvette Swartz
Melissa Fierro
Jimmy Harrick
Amy Harrick
Blake Richards
Tristina Richards
Janette A. Uribe
Savanna Ochoa
Charles Thomas Talley
Delose Howard
David Preciado
Joshua Mejia
Jordan Hicks
David J. Grijalba Jr.

Janette Mejia OBO Jullien Mejia
Rocky Tepesano
Delane Leivas
Tricia Sean Reed
Tina Galarza
Daniel Flores
Alejandra Uribe
Joshaway Stevens
Reynita Banaban
Joseph Kinder
Lynne Reick
Robert Cesario
Eric Dwayne Dubose
Jennifer Aparicio
Mariama Amina Walker
Ruth Legaspi
Brittney Ellen Natrop
Katrina Morgan
Georgianne Marie Morgan
Shannon Lynn Rimmer
Terrie Pettway
Lynnsey Sweet
Amber Van Voorhis
Glenda Rebollar
Nancy Stevenson
Roni Pinto
Lisa Ann Lelanie Domen
Donte Marshall
Katie Young
Shannon Anderson
Wendy A. Dormer
Glenn J. Dormer
Jonathan Beltran
Lekecia Turner
Michelle Montoya
Ashley Mansperger
Katherine Hoey
Jasmine Rein
Deborah Washington
Angelica Cervantes
Stephanie Booth
Gabrielle Hemphill
Wendy Marie Benford
Malcolm Bissember
Amanda Vandecar
Brittany MacKay
Elyse Donnelly

Sarah Jick
Terrence Birden
Raymond Miller
Jeffrey Reick
Courtney Bean
Paul Balfour
Nicole A. Calomino
Cynthia Michelle Duarte
La Rhonda Kinzebach
Gerard Washack
Erika Brown
Shanyce English
Alan R. Neterer Jr.
Marc Allman
Alfredo Toledo
Trevor Anthony Garza
Tiffanie Buehler
Christopher Salinas
Robert Buehler
Frank L. Hammersley
Daniel D. Knight
Steve Encinias
Marie Chatterton
David Chatterton
Michelle Howlett
Victoria Perry
Peejman Shadalo
Carrie A. Killeen
McKayla Wilson
Laura Gardhouse
Melanie Leanne Fish
Kayla Perez
Lauren Ferguson
Nikolas Ljubic
Rebecca Knepper
Megan Knight
Greg Aguayo
Rae N. Aguayo
Christopher C. Peirce
Eric Fraser
Natalie Vanderstay
Brandon Helmick
Mykenzie Ke'alohilani
Stephanie Fraser
Michelle Brimhall
Janet Zmyewski
Thomas Zmyewski

Brittany Negrette
Jennifer Tillman
Janelle Terkeurst
Jason Banville
Amanda Rumble
Ilene Ryder
Wendy Lynn Lazio
Nicole Gray
Mark Russell
James Hardin
Mark Anthony Austin Sr.
Vanessa Dipolito
Jennifer Cuevas
Lisa Munoz
Walter M. Centeno
Anna Ross
Felicity Clark
Damian K. Einbinder
Deanna Finley
Beth Galofaro
Barbara J. Godron
Itzia Hernandez
Ariel Ontman
Pamela Gomez
Elizabeth Perez
Ryan Thomas Schoenborn
Salofiitu Emanuele
Robyn Dobbs
Jessica Dovalina
Sharon Hoover
Brittnie Nicole Cardenas
Breanna Hayden
Dawn Rodriguez
Stacy Wilbanks
Maria Preciado
Anthony Thomas McBride
Sharon Dillehay
Jihad Randolph
Alissa Savath
Precious Flowers
Joshua K. Stratton
Reylene D. Soto
Jaza'na Miller
Todd Sudakoff
Mike Kemp
Marisa Newman
Juan Vazquez Choto

Philip Jardell
Stevee Brancato
Mark Wade
Israel Samuel Villalobos
Gary Eliot Simmons
Karen Canada
Shirley Palmer
Cameron Conway
Lakisha Conway
Flosieta Ann Davis
Vivek Jayaraman
Amber Hughes
Christian Bennett
Kathryn Renee Leckie
Jennifer Hohnke
John Anthony Perico
Michael Bradley
Marissa Narvaez
Carrie Weidenkeller
Janice Pennington
Cecilia Gallegos
Matthew Pruitt
Angel Smith
Darren Glean
Courtney Nicole Winters
Alyssa Renee Moore
Ralph E. Troisi
Jenna Boyer
Jacob Ratliff
Damian Henry
Sara Beth Schussler
Kimberly Ann George
Nikki Renee Ann Alirez
Steven Dale Boes Jr.
Whitney Linn Hinnant
Dana Royal
Taylor Hurwit
Jesus Vincent Gonzalez
John Alan MacLeod
Ashley Logan
Michelle Souza
Mia Gantt
Parker Stevens
Hillary Hunter
Tommie Serrano
Janice Bradley
Nicole Cleveland

Ruby Johnson
Cheyenne Eberle
Brody Renaud
Shauna McKenzie
Ramces Rodriguez
Jonathan Schussler
Darrin Moreman
Ryan Huntsinger
Julie Huntsinger
Seth Barker
Paula Deronde
Nicole Delgadillo
Kirk Brimhall
Tegan Banville
Jason McMillian
Cathy Barquist



Joseph R. Gordon, B.A., LL.B.



Barrister & Solicitor, Notary Public

207 - 1433 St. Paul Street, Kelowna, BC V1Y 2E4

Phone: (250) 860-9997 Fax: (250) 860-9937

November 10, 2017

MGM Resorts International  
GL Claims Division  
MGM Administration Building  
71 E. Harmon Avenue  
Las Vegas, Nevada 89109

And to:

MGM Resorts International/Mandalay Corp.  
3950 South Las Vegas Blvd.  
Las Vegas, Nevada 89119

And to:

MGM Resorts International  
3600 Las Vegas Blvd. South  
Las Vegas, Nevada 89109

To Whom It May Concern:

**RE: Route 91 Harvest Music Festival**

This letter is to support the appeal by Mr. O'Neil, a copy of whose correspondence is attached for your ease of reference, to your sense of decency and to your (business) common sense. Mr. O'Neil asks you to do the right thing, to take the moral high ground by financially compensating the 8 women of Kelowna (the "Kelowna Victims") – not just in your own interest but because it would be the right thing to do.

In further support of some of Mr. O'Neil's points the writer adds:

1. WestJet Airlines, who have less connection than you do to what happened, garnered incredible good will among Canadians and others by offering free or seriously discounted flights out of Las Vegas immediately after the October 1, 2017 killings in your city;
2. The Kelowna Victims, all customers of MGM Resorts, are influential opinion leaders in Kelowna, B.C. (professionals, a policewoman, businesspeople, married and single

women from all walks of life) who have very concerned parents, husbands, significant others, as well as numerous business, family and media connections and associates who are personally interested in your response;

3. Notwithstanding the marketing campaign Mr. O'Neil speaks of to induce people to return to Las Vegas and to your casinos as soon as possible, you would be wise to consider the following, increasingly typical, quote from the Kelowna Courier where at page A6 a local columnist wrote on October 31, 2017: *"Many will be thinking more than twice about going to Las Vegas. The horrible pictures are etched into us all. Many will wonder about travel in the United States at all. And it is not just the threat of terrorism but the threat that Americans are to themselves."*
4. I am informed some, if not all of the Kelowna Victims, missed work because of the anxiety suffered under your watch; had to pay for counselling to help them cope with the trauma of being murderously shot at and missed; and continue to endure the horror of what they were compelled to do to stay alive and to help others and to cope with what they had to see and experience. That counselling, that expense, is ongoing.

Thus said, the writer – a lawyer experienced in the application of the principles of tort law in a common law jurisdiction like Nevada – also appeals to you to do the right thing for the Kelowna Victims by, without prejudice and without admission of liability, within 12 days of your receipt of this letter:

- a) Meaningfully apologizing to them in writing;
- b) Making a full refund forthwith to each of them of the monies, if any, spent at the MGM Resorts businesses, including the MGM Grand;
- c) Compensating each for the counselling expenses, lost work and related expenses of coping with the horror and the high-handed, callous way your representatives dealt with them.

I would suggest, at minimum, that in full and final satisfaction of the above that you make a lump sum payment to each person of \$1,500 CDN. forthwith - and agree to pay for any medically warranted counselling and treatment required by any and all of the Kelowna Victims which is not covered by any applicable insurance plan for 2 years after the shootings. In addition, if you ever want any of them or anybody they know to return to a MGM Resort or to Las Vegas that you give serious consideration to how you might make a future visit more economical and more normal. In consideration, I would be prepared to ask each of the Kelowna Victims to provide you with a mutually-agreeable Release, initially drafted by your counsel, if each of the Kelowna victims is still willing to sign such a Release. That Release may contain a standard confidentiality clause if you wish and would remove each from a potential class action or other claim against you.

It doesn't take much of a negligence lawyer to apply the objective standard of care adopted by negligence law to find you liable on a balance of probabilities, especially in an American Jury system famous for its multi-million-dollar awards, by applying the most commonly employed technique for determining causation-in fact which is the "but for" test, sometimes called the *sine qua non* test. It works like this: if the loss would not have occurred but for the defendant's negligence, that conduct is the cause of the injury.

But for - the shooter's ability to check into one of your hotels with an "armoury", i.e. 10 bags of gun-filled luggage, including 23 guns, bumper-stocks capable of turning rifles into machine guns, and stacks of ammunition, using, in part, a camera-free service elevator, despite your so-called and negligently-designed and monitored security - the shooting would not have occurred.

But for - the shooter's ability to transport multiple firearms in multiple suitcases and carrying cases from the check-in areas to the 32<sup>nd</sup> Floor overlooking what turned out to be the killing fields despite the security you expressly or impliedly promised your patrons and despite your much vaunted and negligently monitored CCTV systems - the shooting would not have occurred.

But for - the inexplicable delay, 6 minutes according to much of the media, forwarding the call from the shooter's floor, through your switchboard system, to the police - some if not all of the shooting would not have occurred.

But for - the inexplicable general delay by hotel security in advising police that Mr. Campos had been shot, the failure to relay that critical information to the officers searching the hotel - allowing Stephen Paddock extra time to open up on the Crowd in the interval - and the deprivation from the first responders of the information they needed to address the situation more appropriately - a good number of the 58 lives would not have been lost, fewer than the 500 people who were shot but not killed would have suffered, and many, like the Kelowna victims, would not have been traumatized.

But for - in a firearm friendly state like Nevada, in a firearm - riddled country like the USA, your failure to arm your security guard who might otherwise have been able to meaningfully intervene instead of getting shot in the leg and having to retreat - the shooting would not have occurred.

But for - your failure at many levels to determine or investigate why the shooter had installed a camera in his hotel room door and another in the housekeeping cart and had refused housekeeping service for no good and valid reason - all of which was highly suspicious activity and involved malicious damage to your property and breach of your procedures - the shooting would not have happened.

But for - your staffs' heavy-handed and insensitive rejection of a timely and reasonable request for reimbursement - pursuant to your corporate policies no doubt - you allowed a claim for punitive damages to evolve.

You would have had a duty of care, for example, and absolute liability under the American equivalent of Ryland v. Fletcher to prevent a conventional fire of any sort in the Mandalay Bay Resort and Casino from spreading and causing death, destruction and damage off your property. You woefully failed to take all reasonable steps to detect, report and deal with the murderous gunfire of Stephan Paddock, one of your preferred guests, when his gunfire from within the confines of your property killed many, gruesomely wounded others and traumatized the Kelowna Victims.

Relevant to what you should have reasonably foreseen i.e. your duty of care to provide appropriate security to protect your patrons and to protect others from your patrons, are the following:

- a) Nevada has such a firearm problem that it ranks 3rd in the U.S. by Suicide Deaths;

- b) Nevada has the highest dubious ranking of 5<sup>th</sup> in the U.S. for fatal domestic violence, which basically means the killing of women;
- c) Nevada is 65% above the US national average for domestic gun violence;
- d) Nevada is ranked #37 in the U.S. for gun prevalence;
- e) Nevada polled at 36% being the median % of households with guns in 2002;
- f) Nevada does not require any background check for online ads for guns that connect buyers with sellers;
- g) Nevada is a place 1,036 Nevadans were killed with guns in the past decade according to the U.S. Centres for Disease Control and Prevention;
- h) Nevada is in a country presenting internationally with the highest percentage of guns per capita in the world;
- i) Nevada is in a country where the rate of gun deaths rose in 2016 to about 12 per 100,000 people – the second consecutive increase after a period of relative stability – according to the U.S. Centres for Disease Control and Prevention;
- j) From my discussions with a leading forensic psychiatrist and a review of the studies and literature relevant thereto, it seems that your target market i.e. "high risk" gamblers or "severe gamblers" like Stephen Paddock, to whom you seem to have offered a luxury suite without charge and various other perks, share sociopathic and/or psychopathic traits with "mass killers" much more so than the average person in the population – hence the need for greater, not slack security, with a number of reasonably foreseeable "triggers" in mind;
- k) If a "mass killing" is defined as a killing where at least 4 people are killed, the USA now has mass killings daily.

Even if you are only found to be partially responsible or liable, the offer made above on behalf of the Kelowna Victims will look very good to you later if you lose the opportunity to deal with them now as suggested.

Allow me to strongly suggest therefore, that you do the right thing and not let the Kelowna Victims respond against your interest to those who are trying to persuade them to join a class action. Settle with the Kelowna Victims referred to in Mr. O'Neil's letter now.

This offer is open for acceptance for 12 days after the date of this letter.

Please contact the writer if you have any questions.

Yours very truly,

**GORDON & COMPANY**

Per:

**JOSEPH R. GORDON**

JRG/cb

**Subject:**

**FW: Letter to MGM**

To whom it may concern,

My name is Joe O'Neill. I'm a resident of Kelowna, British Columbia, Canada. My significant other and seven of her friends were in the crowd at the Route 91 Harvest Country Music Festival when all hell broke loose.

I'll spare the details of the event as I'm sure wherever this email ends up the individual reading it will be well-versed in the media coverage. My significant other and all of her friends managed to miraculously escape serious physical injury. What you've probably not heard are the individual accounts of those affected weeks after they literally dodged gunfire and into the distant future; sleepless nights, nightmares, frightened of large crowds, panic as a baseline response to basic stimuli, constant feelings of total helplessness, weeks taken off work and seeking out psychological counselling at great individual expense, and so on. Most of this email would be very well spent by outlining future burdens placed on these young women and their families, however I'll conclude it there in the interest of getting to the point.

I was greatly angered and disappointed in hearing that one of the women had reached out to your conglomerate in an attempt to recuperate some of the money that was spent on accommodations in MGM Grand Signature and roundly dismissed by whomever she was talking to, essentially told that in no way would that happen. In stark contrast to that, Ticketmaster is offering refunds to all those that bought passes to the Route 91 concert in Las Vegas. I've included the link below. Note that there are also accounts out there (as well as one within the below article) that other hotels are offering full refunds to customers affected. It appears as if some companies operating within Las Vegas are indeed appealing to their corporate moral compass instead of roundly dismissing those affected by this tragedy.

<http://www.kwtv.com/content/news/Ticketmaster-apparently-offers-refunds-to-Vegas-concertgoers-450510283.html>

Investigational details have shown that the gunman was comped his hotel stay, food, alcohol, and Lord knows what else. It seems that MGM will roll out the red carpet to keep customers that spend money in their casinos but roundly dismiss customers that were quite nearly killed by multiple high-powered firearms sticking out the windows of that same comped room.

I've gone ahead and pulled some figures that shouldn't be surprising. Did you know that your business is profitable? It's true. Very profitable, in fact. According to your fiscal earnings for Q2 of 2017 available at the below link, the consolidated net revenue of MGM increased 16% year-over-year to the tune of \$2.6 billion. I've also found that MGM Resorts LTD's chief executive officer Jim Murren received a total of \$16.6 million dollars in compensation in 2016, which is a 25% increase in compensation from 2015 alone. This includes \$250,000 for personal aircraft use and nearly \$400,000 in private security costs. Basically, refunding the approximately \$2,320 that these women spent on accommodations at an MGM-owned hotel represents 0.928% of what MGM saw fit to refund the CEO in jet fuel alone.

And a hearty congratulations on your continued expansion, featuring what looks like brand new casinos like MGM Cotai in Macau, and MGM Springfield.

[http://mgmresorts.investorroom.com/earnings?item=15#assets\\_9](http://mgmresorts.investorroom.com/earnings?item=15#assets_9)

<https://www.reviewjournal.com/business/casinos-gaming/mgms-ceo-paid-16-6-million-in-2016-a-25-percent-increase/>

I'm also very alive to the fact that you're neck-deep in a marketing campaign to bring as many people back to Las Vegas and to your casinos as soon as possible. I've personally witnessed several placards mailed out by MGM to friends of mine that are offering amazing deals or fully comped hotel rooms over several days. It doesn't shock me that this is the plan, but it's my true hope that as you turn your corporate eye towards the impact this event will have on the future

earnings and stock price of MGM, I hope you'll at least spare a moment to ease some of the suffering inflicted upon the families affected.

Regards,

Joe O'Neil

On Behalf of:

Sara Poohachoff

Sara Lane

Sasha Yunick

Niki Jackson

Carla Yunick

Steph Conti

Nicky Krastel

Katie Nesbitt



## Attorneys at Law

MITCHELL A. TOUPS, LTD.

BOARD CERTIFIED  
PERSONAL INJURY TRIAL LAW  
TEXAS BOARD OF LEGAL SPECIALIZATION

BOARD CERTIFIED  
CIVIL TRIAL LAW  
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BOARD CERTIFIED CIVIL TRIAL LAW  
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BOARD CERTIFIED CIVIL PRETRIAL PRACTICE  
NATIONAL BOARD OF TRIAL ADVOCACY

LICENSED TO PRACTICE TEXAS & NEW YORK

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BEAUMONT, TX 77702

*MITCHELL A. TOUPS, LTD.*  
*Houston Office:*  
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Houston, TX 77027

*Mailing Address:*  
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Fax: (409) 832-8577

B. ADAM TERRELL  
E. HART GREEN  
STEVEN C. TOUPS, P.C.

EDWARD H. GREEN  
(1935-2016)  
GEORGE A. WELLER  
(1911-1986)

JANNEY GORDON, CLA  
Certified Legal Assistant

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[matoups@wgttl.com](mailto:matoups@wgttl.com)  
[jgordon@wgttl.com](mailto:jgordon@wgttl.com)  
Direct Dial: (409) 951-2351

December 13, 2017

Via Email: [Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

Mr. Michael R. Doyen  
Munger, Tolles & Olson, LLP  
350 South Grand Avenue, 50<sup>th</sup> Floor  
Los Angeles, CA 90071

RE: Las Vegas Mass Shooting Litigation

Dear Mr. Doyen:

Please be advised that I have been retained to represent the family and heirs of Jessica Klymchuk, who was killed as a result of the mass shooting that occurred on October 1, 2017, at the Route 91 Concert in Las Vegas, Nevada. In addition, I also represent Celena Garcia and Stacy Garcia, who were also shot during this mass shooting, as well as many other victims.

I plan to be in attendance at the inspection of the room occupied by Paddock next week in Las Vegas, Nevada.

Sincerely,

Mitchell A. Toups

/jg

cc: Craig Eiland

**DE CASTROVERDE**  
LAW GROUP

October 23, 2017

**Attn: Risk Management Dept.**  
MGM Grand Hotel & Casino  
3799 Las Vegas Boulevard South  
Las Vegas, NV 89109

***Via Regular Mail & Certified Mail***

**Re: Our Client:** Gabriela Lomaglio  
**Our Case No.:** 225963-DRS-  
**Date of Loss:** 10/01/2017

Dear Risk Management Dept. :

Please be advised that this office represents Gabriela Lomaglio in their claim for damages resulting from personal injuries sustained in the above-referenced incident. Accordingly, any and all future correspondence should be directed to this office.

It is my understanding and belief that your property has medical payments coverage on your insurance policy. Thus, it is requested that you provide this office with documentation of the coverage available to my client. I will forward the medical billings and records when such are received for payment pursuant to this coverage.

**Further, I am requesting that you preserve any evidence that you may have of this incident, including but not limited to, videotapes of before and after the incident, until this office has the opportunity to inspect such.**

Written confirmation of this representation letter is requested. Should you have any questions and/or concerns, please feel free to contact my assistant, Dianna Saucedo, at 702.383.0606. For future reference, this office's Tax Identification Number is 86-1064003.

Sincerely,

Orlando De Castroverde

RECEIVED  
MGM RESORTS

NOV 5 2017

RISK MANAGEMENT  
CLAIMS DIVISION



**OWEN, PATTERSON & OWEN LLP**

GREGORY J. OWEN\*  
RICHARD A. PATTERSON\*  
SUSAN A. OWEN\*  
TAMIKO B. HERRON  
J. CODY PATTERSON  
DAVID TORRES-SIEGRIST\*\*

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www.opolaw.com  
info@owenpatterson.com

\* PROFESSIONAL CORPORATION  
\*\* OF COUNSEL

April 18, 2018

**VIA EMAIL & UNITED STATES MAIL**

Michael R. Doyen, Esq.  
Munger, Tolles & Olsen LLP  
350 South Grand Avenue, 50<sup>th</sup> Floor  
Los Angeles, California 90071-3426  
Michael.Doyen@mto.com

**Re: Las Vegas Shooting Litigation; Notice of Representation of Clients  
to MGM Resorts International, Inc. Mandalay Corporation, and  
All Related Entities**

Dear Mr. Doyen:

As you may be aware, the individuals listed in Exhibit A attached hereto are represented by Owen, Patterson & Owen, LLP. As counselors for the clients listed in Exhibit A, we request that all future correspondence and/or communications be directed to our attention at the following address:

GREGORY J. OWEN, ESQ.  
RICHARD A. PATTERSON, ESQ.  
SUSAN A. OWEN, ESQ.  
Owen, Patterson & Owen, LLP  
23822 West Valencia Boulevard, Suite 303  
Valencia, California 91355  
(661) 799-3899  
(661) 799-2774 (facsimile)  
info@owenpatterson.com


Effective immediately MGM Resorts International, Inc., Mandalay Corporation and any of their affiliated entities should not contact our clients by mail (postal or electronic), facsimile, telephonically, or otherwise.

Michael R. Doyen, Esq.  
Munger, Tolles & Olsen LLP  
April 18, 2018  
Page 2

Thank you for your anticipated cooperation and courtesy in this matter.

Very truly yours,

OWEN, PATTERSON & OWEN, LLP



---

GREGORY J. OWEN, ESQ.  
RICHARD A. PATTERSON, ESQ.  
SUSAN A. OWEN, ESQ.

SAO:glo  
Enclosure

# OWEN, PATTERSON & OWEN LLP

GREGORY J. OWEN\*  
RICHARD A. PATTERSON\*  
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\* PROFESSIONAL CORPORATION  
\*\*OF COUNSEL

## EXHIBIT A

1. Charles Mayfield;
2. Christine A. Mayfield;
3. Charles Mayfield, IV;
4. Anne Mayfield, a minor, by and through her Guardian ad Litem, Charles Mayfield;
5. Amanda Davis, Individually and as Successor-in-Interest to Decedent, John Phippen;
6. Travis Phippen, Individually and as Successor-in-Interest to Decedent, John Phippen;
7. Nathan Phippen, Individually and as Successor-in-Interest to Decedent, John Phippen;
8. Aliyah Phippen, a minor, by and through her Guardian ad Litem Amanda Davis, Individually and as Successor-in-Interest to Decedent, John Phippen;
9. Steven Gomez, Individually and as Successor-in-Interest to Decedent, Angela Gomez;
10. Julie Gomez, Individually and as Successor-in-Interest to Decedent, Angela Gomez;
11. Stacey Brown-Fusano;
12. Gilbert Segovia;
13. Alicia Segovia;
14. Julie Dove;
15. Thomas Durell;
16. Selso Salazar;
17. Renee Salazar;
18. Jacob Ratliff;
19. Robert Bradshaw;
20. Cindy Bradshaw;
21. Jessica Presten;
22. Kortney Spencer;
23. Dominic Rabanal;
24. Cherish McGuire;
25. Jack Pinkston;
26. Jaeger Woodson;
27. Victoria Blackbird;
28. Shawn McKay;
29. Tara Reyes;
30. Kendall Dusenberry;
31. Brian Mallette;
32. Shawn Scarlett;
33. Sarah Scarlett;
34. Shaylenne Scarlett;

35. Savannah Thomas;
36. Gabrielle Thomas;
37. Russell Bleck;
38. Breanna Skagen;
39. Derek Miller;
40. Troy Springer;
41. Shannon Springer;
42. Frank Sena;
43. Marie Tautrim;
44. Michael Tautrim;
45. Jeremy Viger;
46. Amy Viger;
47. Brian O'Leary;
48. Carrie O'Leary;
49. Rebekah Scheussler;
50. Patricia Cope;
51. Peter Violas;
52. Mylika Pope;
53. Rob Jones;
54. Misty Jones;
55. Kari Carlstrom;
56. Ilene Scandlyn;
57. Casey Scandlyn;
58. Michael Greenfield;
59. Patrick Hobbs;
60. Gloria Aguirre;
61. Calia Sanford;
62. Michael Rogozik;
63. Monica Rogozik;
64. Rebecca Wilken;
65. Jamie Lavery;
66. Sophia Lima;
67. Gary Aase;
68. David Aase;
69. Crystal Salazar;
70. Wendy Heirshberg;
71. Steven Heirshberg;
72. Lisa Muzycka;
73. Brooke Laney;
74. Michelle Powell;
75. Chris Powell;
76. Amy Bergin;
77. Scott Bergin;
78. Diana De La Maza;
79. Roland De La Maza;
80. Vincent Sager;
81. Lee Skolnick;
82. Ethan Sanchez;
83. Tricia Welch;
84. Kiersten Harling;
85. Simon Harling;
86. Steven Flores;

87. Ruben Talamantez;
88. Misty Snitzer;
89. Cheyene Bacon-Meriweather;
90. Luke Adam;
91. Joanne Rusconi;
92. Susie LaPorte;
93. Mitchell LaPorte;
94. Logan LaPorte;
95. Dawn Beauchamp;
96. Brad Beauchamp;
97. Danyale Petterson;
98. Sheldon Mack;
99. Kimberlee Peoples;
100. Michael Goodnight
101. Patricia Murillo
102. Andrew Dahring
103. Nancy Dahring
104. Rachel Roach
105. Steven Resnick
106. Brenda Resnick
107. Bradley Resnick
108. Parisse Villalobos
109. Lisa Villalobos
110. Don Villalobos
111. Dillon Villalobos
112. Moses Villalobos
113. Tamara Sheehan
114. Alexis Cady
115. Matthew Cady
116. Tayler Brunner
117. Reighlynn Parsley
118. Tanya McClain
119. Michael McClain
120. Sara Ramirez
121. Stephanie Whealon
122. Bret Ivey



Bighorn Law  
716 S. Jones Blvd.  
Las Vegas, NV 89107

P 702.333.1111  
F 702.507.0092

bighornlaw.com

January 30, 2018

**VIA CERTIFIED U.S. MAIL ONLY**

MGM Grand Las Vegas  
Risk Management  
3799 S. Las Vegas Blvd  
Las Vegas, NV 89109

**Re: Estate of James Sonny Melton v. MGM, et al.**

My Client: Heather Melton, the Estate of James Sonny Melton  
DOL: October 1, 2017  
Claim No.: Please Provide

Dear Sir or Madam:

Please be advised that I have been retained to represent Ms. Heather Melton, the Administrator of the Estate of James Sonny Melton with regard to his wrongful death as a result of the events that took place on October 1, 2017 while James and Heather were visiting the Route 91 Festival in Las Vegas, Nevada. Please be advised that I also represent Mrs. Heather Melton for her own individual claims as a result of this event.

Please allow this letter to notify MGM Properties and/or Live Nation of their affirmative obligation to appropriately preserve and retain any information that may be relevant to the above referenced matter. The potentially relevant information is expected to include documents and/or electronically stored information (ESI) as defined by the Nevada Rules of Civil Procedure. The laws and rules prohibiting destruction of evidence apply to electronically stored information in the same manner that they apply to other evidence. Due to its format, electronic information is easily deleted, modified or corrupted. Accordingly, MGM Properties and Live Nation must take every reasonable step to preserve this information until the final resolution of this matter.

We therefore demand that you, including third parties and past employees, preserve and do not delete, discard, or otherwise destroy original and all copies of documents, ESI or tangible materials. This includes computers and devices in your possession, under the control of your company, your employees or agents. Furthermore, MGM Properties and Live Nation has the obligation to discontinue all data destruction and backup tape recycling policies; preserve and not dispose of relevant hardware unless an exact replica of the file (a mirror image) is made; preserve and not destroy passwords, decryption procedures (and accompany software), network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction

software; and maintain all other pertinent information and tools needed to access, review, and reconstruct necessary to access, view, and/or reconstruct all requested or potentially relevant electronic data. If any items covered above are not in your possession or control, please notify the current custodian of their duty to preserve the information.

Although it is your responsibility to identify and appropriately preserve and retain all relevant information, we have specifically identified these items, among others, as having a particularized likelihood of containing discoverable information about the wrongful death of Mr. Melton and the injuries sustained by Ms. Melton while they were guests at the Route 91 Festival in Las Vegas, Nevada. This list includes, but is not limited to:

1. Any and all contracts and/or agreements and/or vendor arrangements relating to the Route 91 Festival;
2. Any and all photographs pertaining to the Route 91 Festival;
3. Any and all advertisements pertaining to the Route 91 Festival, to include written, photographed, audio, or visual advertisements;
4. Any and all advertisement campaigns from October 1, 2016 – Present;
5. Any and all surveillance videos pertaining to the Mandalay Bay Hotel & Casino, the Delano Hotel, the MGM grounds for the Route 91 Festival, and any other surveillance footage pertinent for this matter;
6. Any and all employment files pertaining to those employees employed by MGM Properties and/or Mandalay Bay Hotel & Casino, and/or Live Nation from October 1, 2007 – Present;
7. Any and all photographs taken at the Route 91 Festival;
8. Any and all incident reports, memorandum, and/or other writings related to the Route 91 Festival;

Appropriate preservation and retention of electronic information requires that the information be stored in the state and format that it currently exists. Copying or other manipulation could modify relevant information potentially resulting in evidence spoliation. For computers and other devices (including portable and home systems) identified you need to act to prevent modification, destruction or concealment of ESI due to deleting files, overwriting files, using data shredding and erasure applications, defragmenting, reimaging, encrypting, compressing or physical damage. Data may need to be preserved by immediate acquisition, authentication and preservation of data (forensically qualified image). Be advised that the data not acquired in a forensically qualified method may be challenged. Simply booting a drive, examining its contents or running any application will irretrievably alter the evidence it contains and may constitute unlawful spoliation of evidence. Please suspend any policies or protocols that may lead to any destruction of ESI. Notify any and all employees in possession of discoverable material. Disregarding these obligations may be considered spoliation of evidence.

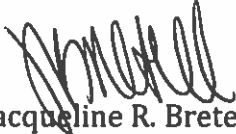
For each piece of media that MGM Properties and/or Live Nation maintains, MGM Properties and/or Live Nation must document a complete chain of custody. A proper chain of custody will ensure that no material changes, alterations or modifications were made while the evidence was handled. Chain of custody documentation must indicate where the media has been, whose possession it has been in, and the reason for that possession.

Compliance with MGM Properties and/or Live Nation's preservation obligations includes forwarding a copy of this letter to all individuals or organizations that are responsible for any of the items referred to in this letter.

If this correspondence is in any respect unclear, please call me immediately.

Kind regards,

**BIGHORN LAW, LLC**



Jacqueline R. Bretell, Esq.

JRB/ja

RECEIVED  
MGM RESORTS  
FEB 27 2018  
RISK MANAGEMENT  
GL CLAIMS DIVISION



**BROCK OHLSON**  
**INJURY LAWYERS**  
6060 ELTON AVENUE  
LAS VEGAS, NV 89107  
702.982.0055 PHONE  
702.982.0150 FAX

---

BROCK OHLSON, ESQ.<sup>ΔΩ∞</sup>  
IAN MCMENEMY, ESQ.<sup>Δ</sup>

<sup>Δ</sup>ADMITTED IN NEVADA  
<sup>Ω</sup>ADMITTED IN CALIFORNIA  
<sup>∞</sup>ADMITTED IN ARIZONA

July 12, 2018

VIA Electronic Mail: [Michael.Doyen@mto.com](mailto:Michael.Doyen@mto.com)

Mr. Michael R. Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426

RE: Las Vegas Shooting Litigation; Notice of Representation of Clients to MGM Resorts International, Inc., Mandalay Corporation, and All Related Entities

To Whom It May Concern:

I represent Kristin Munding in connection with the October 1<sup>st</sup> incident. Please direct all future correspondence or communication to my office.

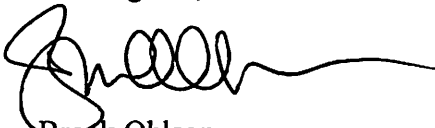
It should go without saying, all evidence must be preserved. Any destruction of any evidence will be viewed as spoliation of the same.

It is anticipated the combined claims will become the subject of a multi-claimant resolution process. Please advise as to all particulars once the process of determining a particular claims value commences.

Effective immediately MGM Resorts International, Inc., Mandalay Corporation, or any of their affiliated entities, should not contact my clients by mail (postal or electronic), phone, or otherwise.

Thank you for your anticipated cooperation in this matter.

Best regards,



Brock Ohlson

BKO/ms

**B O W E N   L A W   O F F I C E S**

**Attorneys & Counselors At Law**

From the desk of: Jerome R. Bowen

**BOWEN LAW OFFICES**  
9960 West Cheyenne Avenue., STE. 250  
LAS VEGAS, NEVADA 89129  
Twllcox@lvlawfirm.com

**TELEPHONE**  
(702) 240-5191

**FACSIMILE**  
(702) 240-5797

November 14, 2017

The Mirage Hotel and Casino  
Director of Security  
3400 Las Vegas Blvd S.  
Las Vegas, Nevada 89109  
Phone: (702) 791-7111

Via: U.S. MAIL, U.S. CERTIFIED MAIL

**RE:   Date of Incident       :       October 1, 2017**  
**Our Client               :       Cynthia O'Connor**

To Whom it May Concern:

Please be advised that the undersigned now represents Cynthia O'Connor regarding her personal injury incident that occurred on October 1, 2017.

The purpose of this letter is to put you on notice not to destroy, conceal, or alter any, video footage, photos and other electronic data generated by The Mirage Hotel and Casino, or any other electronic data, such as email or voice mail. As you know, this duty extends to your agents and employees as well. As Ms. O'Connor previously notified you of this incident immediately after it occurred, your duty to preserve stemmed from that time. It is imperative that you immediately advise all applicable individuals involved with The Mirage Hotel and Casino to again preserve all evidence relating to the claim in the above-referenced case. The failure to comply with this notice may result in severe sanctions being imposed by a court of law. Notwithstanding this notice, The Mirage Hotel and Casino has legal obligations to maintain and preserve said video footage, photos and other electronic data from the time they were on notice of the potential claim on October 1, 2017. Thus, Ms. O'Connor does not waive any legal remedies by providing this notice if The Mirage Hotel and Casino has failed in these legal obligations.

During the discovery process of litigation, Ms. O'Connor expects to obtain video footage, photos and other electronic data, among other things. To avoid spoliation, The Mirage Hotel and Casino must preserve the video footage, photos and other electronic data requested on the original media. We may also ask for certain data on all storage mediums and backup mediums used by The Mirage Hotel and Casino.

All video footage, photos and other electronic data in your client's possession will be subject to Ms. O'Connor's discovery requests and you are obligated to maintain and not alter or destroy such data and media. Such data and media includes, but is not limited to, all video footage, photos and other electronic data and or backup media. More specifically, you must preserve all video surveillance, whether internally or externally;

Accordingly, you should:

1. Suspend destruction and rotation practices relating to all document and electronic data, including backup tapes;
2. Preserve all documents and electronic data relevant to the allegations in this case, including but not limited to, video surveillance, incident reports and any other communications with customers, clients, employees, other defendants, and any other third party and all related entities.

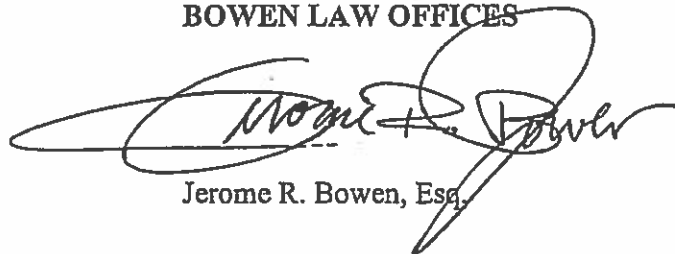
I strongly suggest that you also advise all employees who have access to any of the items encompassed within this letter of their duty to preserve evidence and instruct them to refrain from destroying or tampering with any of these items. Please note that there is no specific limit on the time frame applicable to this request. Accordingly, please advise these individuals not to destroy or permit the destruction of any of the aforementioned items, even if they may believe them to fall outside what they perceive to be a relevant time frame.

Lastly, it is imperative that if any document or other information that is relevant or potentially relevant to lead to discoverable information in this case has been or is altered or in any way diminished or destroyed, that you notify us immediately. This notice is necessary to ensure the timely attempt to preserve or forensically retrieve the information and to prevent or mitigate the prejudicial destruction of evidence.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Best regards,

BOWEN LAW OFFICES

A handwritten signature in black ink, appearing to read "Jerome R. Bowen", is written over the printed name. The signature is stylized with a large, sweeping loop at the end.

Jerome R. Bowen, Esq.

JRB/mh



## THE STERLING FIRM

9031 PHYLLIS AVENUE, SUITE 1  
WEST HOLLYWOOD, CA 90069

TELEPHONE: (310) 409-2750 • FAX: (310) 734-7002 • EMAIL: INFO@THESTERLINGFIRM.COM

November 25, 2017

**VIA USPS CERTIFIED MAIL RETURN RECEIPT : 9414 8108 9876 5001 148 78**

MGM RESORTS INTERNATIONAL  
3600 S Las Vegas Blvd  
Bellagio Hotel & Casino  
Las Vegas, NV 89109  
Telephone: 866-761-7111

**RE: Notice of Representation**  
**Our Client: Joseph Pace**  
**Date of Incident: 10/01/2017**  
**Spoliation Notice: Formal Demand to Produce and Preserve Evidence**

Dear Sir or Madam:

This office has been retained by **Mr. Joseph Pace** to provide legal representation in his claims for personal injury compensation resulting from the **the Las Vegas shooting that occurred on or about October 1, 2017**. Please direct all correspondence concerning this matter to this office.

**Please provide all relevant documents which pertains to the above incident, including any and all police reports, statements, and other documents.**

Upon your cooperation, this matter can be resolved without requiring the assistance of the Court. In order to facilitate a resolution, please provide this office with your applicable insurance policy and carrier providing coverage for the incident. If you do not cooperate, we are prepared to file a formal Complaint with the Court. If you have legal counsel, please provide this office with their contact information so that we may correspond accordingly.

This letter also constitutes our Formal Demand that you take any and all steps necessary to produce and preserve any and all evidence concerning the above referenced incident.

Such evidence includes, but is not limited to, the following:

1. Any and all security video, surveillance video, incident reports, statements and reports, police reports, 911 tapes, and/or call logs, which relate to, or which reflect in any manner, any part or portion of the above referenced incident;
2. Any and all incident reports, accident reports, investigation reports and/or witness statements, which relate to, or which reflect in any manner, any part or portion of the above referenced incident;
3. Any and all photographs or video footage, which relate to, or which reflect in any manner, any part or portion of the above referenced incident;
4. Any and all items of tangible evidence or documents of any kind, i.e. reports, statements, evaluations, assessments, inter alia, which reflect in any manner, any part or portion of the above referenced incident.

The Sterling Firm  
Page 2

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Take notice that under California and other state law, unless justified by you, any intentional or negligent destruction, concealment, alteration or failure to preserve any relevant documents, data, information or evidence, reasonably known of when eliminated, will be subject to sanctions. Intentional, grossly negligent or culpable conduct such as destroying or preventing the use of evidence may result in exemplary or punitive sanctions in order to adequately compensate our client.

Please note that California Civil Jury Instruction (CACI) 204, entitled "Willful Suppression of Evidence," informs the jury: "You may consider whether one party intentionally concealed or destroyed evidence. If you decide that a party did so, you may decide that the evidence would have been unfavorable to that party."

Should you have any questions, please do not hesitate to contact our office at phone number (310) 498-2750.

Sincerely,  
THE STERLING FIRM, A PROFESSIONAL LAW CORPORATION



Justin Sterling, Esq.

Enclosures: Insurance Information Form to be Returned, Proof of Service

The Sterling Firm  
Page 3

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**INSURANCE INFORMATION FORM TO BE RETURNED**

Please provide the following information and return as soon as possible:

Name of Your Insurance Carrier: \_\_\_\_\_

Address of Insurance Carrier: \_\_\_\_\_

Your Insurance Coverage Policy Number: \_\_\_\_\_

Identify the Coverage Limits: \_\_\_\_\_

Dates of Coverage and Expiration: \_\_\_\_\_

Identify whether the Coverage includes MedPay: \_\_\_\_\_

Your Name and Title: \_\_\_\_\_

Signature: \_\_\_\_\_

The Sterling Firm  
Page 4

# PROOF OF SERVICE

STATE OF CALIFORNIA )  
 ) ss  
COUNTY OF LOS ANGELES )

I am employed in the county of Los Angeles, state of California. I am over the age of 18 and not a party to the within action; my business address is 9031 Phyllis Avenue, Suite 1, West Hollywood, CA 90069.

On November 9, 2017, I served the foregoing documents described: **NOTICE OF REPRESENTATION AND SPOILIATION NOTICE (Notice to Preserve Evidence)** on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope addressed as follows:

MGM RESORTS INTERNATIONAL  
3600 S Las Vegas Blvd  
Bellagio Hotel & Casino  
Las Vegas, NV 89109  
Telephone: 866-761-7111

  X   (BY MAIL - CERTIFIED RETURN RECEIPT) I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

       (BY ELECTRONIC MAIL) I caused such to be transmitted to the email address indicated above.

  X   (BY FIRM PRACTICE) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on the same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing in the affidavit.

       (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the office of the addressee.

       (BY FACSIMILE) I caused all of the pages of the above entitled documents to be sent to recipients noted above via electronic transfer (FAX) at the respective telephone numbers indicated above.

  X   (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

       (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

Executed on the 25th day of November 2017 at Los Angeles, California.



Justin Sterling, Esq.

LAW OFFICES OF

# MANSELL & MANSELL

A PROFESSIONAL CORPORATION

1645 North Vine Street, Suite 306  
Los Angeles, California 90028-8805

Telephone: (323) 466-4900  
Facsimile: (323) 466-4999

October 30, 2017

MGM Resorts International  
3600 South Las Vegas Boulevard  
Bellagio Hotel & Casino  
Las Vegas, NV 89109

Mandalay Bay Hotel  
3950 South Las Vegas Boulevard  
Las Vegas, NV 89119

RE: Our Client: Collin Parker, on behalf of his daughter, Rachael Parker, Deceased  
Incident of October 1, 2017

Dear Sir or Madam:

Please be advised our office has been retained by Collin Parker to bring a wrongful death lawsuit against you and others for the death of his daughter, Rachael Parker, who died as a result of injuries sustained in the October 1, 2017, massacre. If you carry liability insurance to cover such claims, please forward this letter to your insurance carrier and have it contact the undersigned immediately. If you are self-insured for this incident, please have your representative contact this office.

We hereby request the PRESERVATION and PRODUCTION of any and all salient evidence, including but not limited to all reports, products, items, materials, evidence, photographs and video-tape pertaining to the massacre and investigation thereof. Any loss, tampering, destruction, alteration or other spoliation of said evidence without the written consent of my office will constitute spoliation of evidence for which claimant will seek appropriate relief.

Sincerely,

MANSELL & MANSELL, A.P.C.



ROBERT MANSELL  
RM:sr



**JOSHUAMAURER.COM**  
**1604 WEST DEAN**  
**SPOKANE, WASHINGTON 99201**



11/06/2017

Mandalay Bay  
3950 S Las Vegas Blvd  
Las Vegas, NV 89119

RE: My Client: Estate of Rachael Parker  
Date of Incident: October 1, 2017

Belinda/Bob

Emailed to MRI assistance  
on 11/29.

✓Lester

To whom it may concern,

This letter is to formally advise you that we have been retained by the Estate of Rachael Parker regarding the above-referenced accident. Please direct any and all future correspondence involving our client to this office.

Please note the following:

1. If you have obtained any statements (whether written, recorded, or otherwise) please forward a copy of the same to this office.
2. Please forward any photographs or video footage you have of my client.

We are currently investigating and developing this claim. As per above, please direct all future communications to our office.

Sincerely,

*Miranda Goodey*  
Miranda Goodey

# NURENBERG PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

November 16, 2017

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

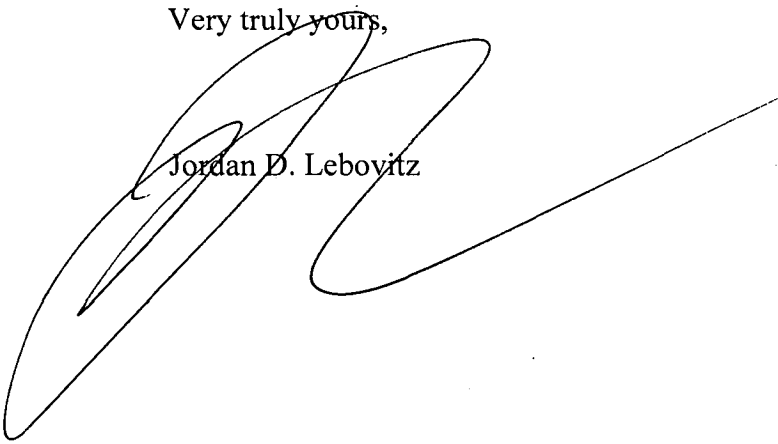
RE:	My Client:	Celina Phem
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80533

Dear Sir/Madam:

Please be advised that this office has been retained to represent Celina Phem for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,

  
Jordan D. Lebovitz

JDL/ep

NAGEL RICE, LLP

COUNSELLORS AT LAW

BRUCE H. NAGEL\*  
JAY J. RICE\*  
ROBERT H. SOLOMON  
DIANE E. SAMMONS<sup>o</sup>  
LORI I. MAYER<sup>o</sup>  
RANDEE M. MATLOFF  
ANDREW L. O'CONNOR  
GREG M. KOHN<sup>o</sup>

HARRY A. MARGOLIS  
(1928-2002)

103 EISENHOWER PARKWAY  
SUITE 103  
ROSELAND, NEW JERSEY 07068  
(973) 618-0400  
FAX: (973) 618-9194  
www.nagelrice.com

230 PARK AVENUE  
NEW YORK, NY 10169  
(212) 551-1465

PLEASE REPLY TO  
ROSELAND OFFICE

OF COUNSEL  
CARLETON R. KEMPH<sup>o</sup>

SUSAN F. CONNORS  
BRADLEY L. RICE<sup>o</sup>  
ANDREW I. PEPPER  
MICHAEL J. PARAGANO<sup>o</sup>  
ZACHARY A. GOLDMAN<sup>o</sup>

\*CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
<sup>o</sup>MEMBER OF NJ & NY BARS

April 11, 2018

**VIA Electronic Mail**

Mr. Michael R. Doyen  
Munger, Tolles & Olson LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Michael.Doyen@mtol.com

RE: Las Vegas Shooting Litigation; Notice of Representation of  
Clients to MGM Resorts International, Inc., Mandalay  
Corporation, and All Related Entities

Dear Mr. Doyen:

Please be advised my office represents Matthew and Laura Rich,  
John Larsen, and Robin McCormick. As counselors for the claimants  
listed above, we request that all future correspondence or  
communications be directed to our attention.

Effective immediately MGM Resorts International, Inc.,  
Mandalay Corporation, or any of their affiliated entities, should  
not contact our clients by mail (postal or electronic), phone, or  
otherwise. Thank you for your anticipated cooperation in this  
matter.

Very truly yours,

s/ Greg M. Kohn

GREG M. KOHN

# NURENBERG □ PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

November 16, 2017

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE:	My Client:	Nicole Sandekian
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80509

Dear Sir/Madam:

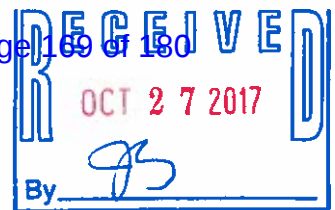
Please be advised that this office has been retained to represent Nicole Sandekian for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,

Jordan D. Lebovitz

JDL/ep



## NAPOLIN LAW FIRM, INC.

October 23, 2017

**Sent Via Fax & U.S. Mail**

MGM Resorts International  
3600 S. Las Vegas Blvd.  
Las Vegas, Nevada 89109

Attn: Security Department Manager

**NOTICE TO PRESERVE ELECTRONIC EVIDENCE – VIDEO SURVEILLANCE AND  
AUDIO RECORDINGS**

**RE: Class Action Lawsuit (Los Angeles Superior Court Case No. BC680065)**

Dear Security Department:

My office has been engaged to represent multiple Plaintiffs for claims of personal injury against you arising out of the mass shooting that occurred on October 1, 2017 at the Mandalay Bay and the Las Vegas Village concert venue.

This letter requests your immediate action to preserve electronically-stored information. Specifically, **VIDEO FOOTAGE AND AUDIO RECORDINGS**, which may contain important evidence regarding the above-referenced legal matter.

This Notice applies to the **video surveillance cameras** used to monitor the interior and exterior of the Mandalay Bay Hotel and Casino as well as the Las Vegas Village concert venue. This Notice further applies to archives, backup and disaster recovery tapes, discs, drives, cartridges and data.

Please provide a copy of the video and audio recordings for September 25, 2017 through October 2, 2017. Please also provide a copy of any incident report, and any other evidence pertinent to the incident.

My office will pay all reasonable and customary costs and fees for such preservation request. Please inform me at your earliest convenience so that payment can be made.

Very truly yours,  
**NAPOLIN LAW FIRM, INC.**

A handwritten signature in blue ink, appearing to read "Alexander D. Napolin".

Alexander D. Napolin, Esq.

# NURENBERG $\square$ PARIS

— NURENBERG PARIS HELLER & McCARTHY —

A Legal Professional Association

Jordan D. Lebovitz, Esq.  
(216) 694-5257  
jordanlebovitz@nphm.com

February 23, 2018

SENT VIA CERTIFIED  
AND REGULAR U.S. MAIL

MGM Resorts International  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, NV 89119

RE:	My Client:	Jennifer Sylvester
	Date of Injury:	October 1, 2017
	Location of Incident:	Mandalay Bay, Las Vegas, NV
	Your Client:	MGM Resorts International
	My File No.:	80688

Dear Sir/Madam:

Please be advised that this office has been retained to represent Jennifer Sylvester for personal injuries sustained as the result of the incident which occurred on October 1, 2017.

Kindly contact me upon receipt of this letter.

Very truly yours,



Jordan D. Lebovitz

JDL/ep

The Law Office of Karen H. Ross

Karen H. Ross\* karenross@khrllawgroup.com

2275 Corporate Circle, Suite 160 Henderson, NV 89074 T 702.485.4152 F 702.485.4125 www.lawofficeofkarenhross.com

November 16, 2017

**Via Certified Mail Return Receipt Requested**

Mandalay Corp.  
c/o CSC Services of Nevada, Inc.  
2215-B Renaissance Drive  
Las Vegas, Nevada 89119  
*Registered Agent*

RE: *Preservation Letter—Mandalay Bay Hotel and Casino*  
*Date of Loss: October 1, 2017*

To Whom It May Concern:

This firm has been retained to represent the interests of Christina Thebeau ("Ms. Thebeau") in connection with an incident that took place on October 1, 2017 while Ms. Thebeau was attending the Route 91 Harvest Music Festival located at 3901 South Las Vegas Boulevard, Las Vegas, Nevada 89119 ("Incident").

Please allow this letter to formally serve as notice to immediately protect and preserve all existing documents, data and other evidence relevant to this claim, including, without limitation: surveillance records, maintenance records, photographs, incident reports, videos, work orders, witness statements, construction records, safety violations, property inspection records, injunctions, investigation records, notes, memoranda, and/or communications having any relationship to the above referenced Incident. Please instruct everyone with access to said records to suspend deletion, overwriting, or any other possible destruction of relevant electronic documents and data.

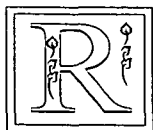
Please note that the duty to preserve any and all relevant evidence is broad and that this notice shall not be narrowly construed. Please feel free to contact our office upon receipt of this letter.

Sincerely,

THE LAW OFFICE OF KAREN H. ROSS



Karen H. Ross, Esq.



**SCHULTZ & ASSOCIATES, L.L.P.**

Attorneys at Law

A Registered Limited Liability Partnership

640 Cepi Drive, Suite A

Chesterfield, Missouri 63005-1221

ROBERT SCHULTZ

Admitted in Missouri

Licensed U.S. Patent & Trademark Office

rschultz@sl-lawyers.com

Telephone (636) 537-4645

(888) 537-4645

Facsimile: (636) 537-2599

www.sl-lawyers.com

February 19, 2018

Mr. John M. McManus  
Executive Vice President and General Counsel  
MGM Resorts International  
3600 Las Vegas Boulevard South  
Las Vegas, Nevada 89109

Dear Mr. McManus:

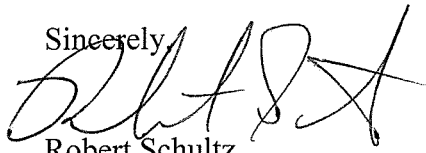
I represent two customers (Elana Williams and Anthony Williams) of your firm's Mandalay Bay hotel who were present and checked in hotel guests on October 1, 2017. Their room was on the 5<sup>th</sup> Floor of Mandalay Bay and their confirmation number was #771645771. Both of my clients were traumatized and upset from the shooting, the panic, their separation, and the inability of the mother (Elana Williams) to return to her room where her son (Anthony Williams) had managed to escape.

My clients have been approached by lawyers to file another lawsuit against your company. Elana Williams, the mother, came to see me and we thought it might be more convenient for you if we approached you through a letter rather than lawsuit.

My clients are willing to forego and waive any claim against Mandalay Bay, MGM Resorts International, Live Nation Entertainment Inc., and any of their employees or officials in exchange for a total payment of \$15,000.00.

I hope we can resolve this matter quickly for your firm and for my clients.

Thank you for your courtesy.

Sincerely,  
  
Robert Schultz

RS/jk



# EGLET PRINCE

September 19, 2018

Camelot Steakhouse  
Excalibur Hotel  
3850 S. Las Vegas Blvd.  
Las Vegas, NV 89109

**Re:** Our Client: Flossie Wilson  
Our Case No.: 249475  
Date of Loss: October 1, 2017

Dear Sir or Madam:

Please be advised that this firm has been retained to represent the interests of Flossie Wilson for injuries sustained from the Mandalay Bay, 1 October shooting.

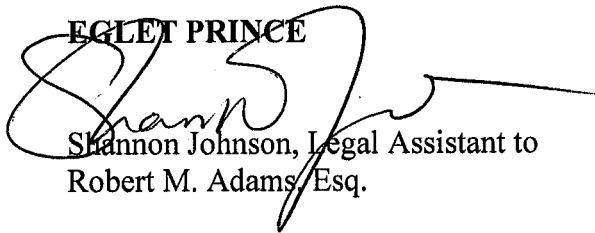
It is our understanding that our client is or was employed by your company at the time of this incident. At this time, we request that you complete the attached form, and return to us as soon as possible. Please return all correspondence and documents to my attention at:

400 South 7<sup>th</sup> Street  
Fourth Floor  
Las Vegas, NV 89101

In addition to the Wage Loss Verification Form, please find our client's signed authorization permitting the release of the requested information. Should you have any questions, please do not hesitate to call my assistant, Shannon at (702) 450-5400. Thank you in advance for your anticipated cooperation.

Sincerely,

EGLET PRINCE



Shannon Johnson, Legal Assistant to  
Robert M. Adams, Esq.

RMA:sj

**EMPLOYMENT VERIFICATION**

1. **EMPLOYEE:** Flossie Wilson
2. **SOCIAL SECURITY NO.:** 156-50-2674
3. **DATE OF ACCIDENT:** October 1, 2017
4. **DATES OF EMPLOYMENT:** *from:* \_\_\_\_\_ *to:* \_\_\_\_\_
5. **POSITION AND DUTIES:** \_\_\_\_\_
6. **NUMBER OF HOURS WORKED** *per week (including overtime) prior to accident:*  
\_\_\_\_\_
7. **RATE OF PAY** *including average tips, commissions & bonuses prior to accident:*  
\_\_\_\_\_ \$ \_\_\_\_\_ *per (hour, day, week, etc.)* \_\_\_\_\_
8. **TIME LOST** *due to accident (indicate dates and hours absent):* \_\_\_\_\_  
\_\_\_\_\_
9. **WORK LIMITATIONS** *of employee after return to work:* \_\_\_\_\_  
\_\_\_\_\_
10. **EMPLOYEE PERMANENTLY REPLACED** *because of absence:* Yes \_\_\_\_\_ No \_\_\_\_\_

(COMPANY STAMP)

*Date:* \_\_\_\_\_

*Company:* \_\_\_\_\_

*Signed:* \_\_\_\_\_

*Title:* \_\_\_\_\_

## Authorization for Release of Protected Health Information (PHI)

<b>Section A: This section must be completed for all Authorizations</b>					
Patient Name: <u>Flossie Wilson</u>		Birth Date: <u>7/26/1955</u>		Social Security No. (optional): <u>156-50-2674</u>	
Provider's/Health Plan's Name: <u>Camelot Steakhouse Exalibur</u>		Recipient's Name: <u>Eglet Prince</u> Trial Attorneys			
Provider's/Health Plan's Address: <u>3850 Las Vegas Blvd.</u> <u>Las Vegas NV 89109</u>		Address 1: <u>4TH FLOOR, 400 SOUTH 7TH STREET</u>			
		Address 2:			
		City: <u>LAS VEGAS</u>		State: <u>NV</u>	Zip: <u>89101</u>
This authorization will expire on the following: (Fill in the Date or the Event but not both. If left blank, then this consent will automatically expire one year from the date signed. This consent may be revoked upon request at which time it will no longer serve any other future request. <b>Date:</b> <b>Event:</b> <u>Conclusion of Case</u>					
<b>Description of information to be used or disclosed</b>					
<b>Description:</b>	<b>Date(s):</b>	<b>Description:</b>	<b>Date(s):</b>	<b>Description:</b>	<b>Date(s):</b>
<input type="checkbox"/> All PHI in medical record <input type="checkbox"/> Dictation reports <input type="checkbox"/> Physician orders <input type="checkbox"/> Imaging/Radiology <input type="checkbox"/> Laboratory reports <input type="checkbox"/> Medication Sheets		<input type="checkbox"/> SCAN record <input type="checkbox"/> Cardiac studies <input type="checkbox"/> Progress notes <input type="checkbox"/> Nursing notes <input type="checkbox"/> Transfer forms <input type="checkbox"/> ER Information		<input type="checkbox"/> Abstract: <input checked="" type="checkbox"/> Other: <u>employment</u> <input type="checkbox"/> Other: <input type="checkbox"/> Itemized Bill:	<u>10/1/17</u> <u>to</u> <u>present</u>
I acknowledge, and hereby consent to such, that the released information may contain alcohol, drug abuse, psychiatric, HIV testing, HIV results, STDs or AIDS information. _____ (Initial) . If not applicable please check here <input type="checkbox"/>					
I understand that: I understand that this executed authorization will release protected and sensitive health information. I may refuse to sign this authorization and that it is strictly voluntary. My treatment, payment, enrollment or eligibility for benefits may not be conditioned on signing this authorization. I may revoke this authorization at any time in writing, but if I do, it will not have any affect on any actions taken prior to receiving the revocation. Further details may be found in the Notice of Privacy Practices. If the requester or receiver is not a health plan or health care provider, the released information may no longer be protected by federal privacy regulations and may be redisclosed. I understand that I may see and obtain a copy the information described on this form, for a reasonable copy fee, if I ask for it. I get a copy of this form after I sign it.					
<b>Section B: Is the request of PHI for the purpose of marketing?</b>					
If yes, the health plan or health care provider must complete Section B, otherwise skip to Section C.					
Will the recipient receive financial or in-kind compensation in exchange for using or disclosing this information?					<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, describe:					
What is the purpose of this use or disclosure? <u>litigation</u>					
<b>Section C: Signatures</b>					
I have read the above and authorize the disclosure of the protected health information as stated.					
Signature of Patient/Plan Member/Guardian/Patient/Plan Member Representative: <u>Flossie Wilson</u>				Date: <u>9/19/18</u>	
Print Name of Patient/Plan Member's Representative:				Relationship to Patient/Plan Member: <u>Self</u>	

# EGLET PRINCE

4<sup>th</sup> Floor, 400 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101

Telephone: (702) 450-5400  
Facsimile: (702) 450-5451

## RECORDS AUTHORIZATION

### TO WHOM IT MAY CONCERN:

The Undersigned, Flossie Wilson, hereby authorizes and directs all doctors, chiropractors, hospitals, clinics, physical therapy centers, employers, government agencies and all other persons or entities to make available to EGLET PRINCE, its assigns or representatives, for examination and/or copying, all records, including billing, relating to the medical condition and treatment and/or employment of the undersigned.

These records include, but are not limited to, copies of diagnoses, physicians notes/orders, records of treatment, reports, charts, police reports, photographs, films, x-rays, MRI's, employment records, personnel files, documents reflecting leaves, absences, terminations or other disciplinary actions and payroll records.

These records are to be used for the evaluation and possible pursuit of a claim for the undersigned. This Authorization is to remain valid until the conclusion of the aforementioned claim.

I understand and acknowledge that information disclosed pursuant to this authorization may be subject to re-disclosure by the recipient, EGLET PRINCE, and may no longer be protected by the Health Information Privacy and Accountability Act (HIPAA).

I further fully understand my right to revoke this Authorization, in writing, except to the extent that action has been taken in reliance upon this Authorization.

A photocopy of this Authorization shall be valid.

By presentation of this Authorization, all previous Authorizations are revoked.

This authorization expires on Settlement.

Treatment and payment may not be conditioned on obtaining this authorization.

x Flossie Wilson

Date 9/19/18

# EGLET PRINCE

September 19, 2018

Camelot Steakhouse  
Excalibur Hotel  
3850 S. Las Vegas Blvd.  
Las Vegas, NV 89109

**Re:** Our Client: Wayne Wilson  
Our Case No.: 249474  
Date of Loss: October 1, 2017

Dear Sir or Madam:

Please be advised that this firm has been retained to represent the interests of Wayne Wilson for injuries sustained from the Mandalay Bay, 1 October shooting.

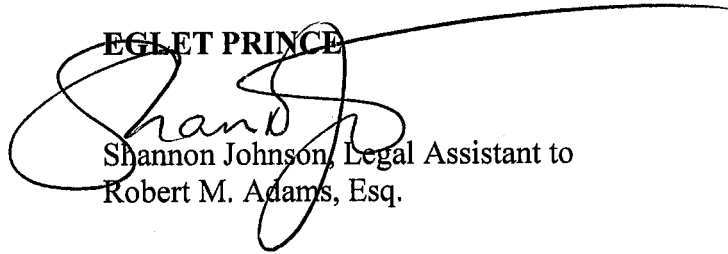
It is our understanding that our client is or was employed by your company at the time of this incident. At this time, we request that you complete the attached form, and return to us as soon as possible. Please return all correspondence and documents to my attention at:

400 South 7<sup>th</sup> Street  
Fourth Floor  
Las Vegas, NV 89101

In addition to the Wage Loss Verification Form, please find our client's signed authorization permitting the release of the requested information. Should you have any questions, please do not hesitate to call my assistant, Shannon at (702) 450-5400. Thank you in advance for your anticipated cooperation.

Sincerely,

EGLET PRINCE



Shannon Johnson, Legal Assistant to  
Robert M. Adams, Esq.

RMA:sj

**EMPLOYMENT VERIFICATION**

1. **EMPLOYEE:** Wayne Wilson
2. **SOCIAL SECURITY NO.:** 566-06-5542
3. **DATE OF ACCIDENT:** October 1, 2017
4. **DATES OF EMPLOYMENT:** *from:* \_\_\_\_\_ *to:* \_\_\_\_\_
5. **POSITION AND DUTIES:** \_\_\_\_\_
6. **NUMBER OF HOURS WORKED** *per week (including overtime) prior to accident:*  
\_\_\_\_\_
7. **RATE OF PAY** *including average tips, commissions & bonuses prior to accident:*  
\_\_\_\_\_ \$ \_\_\_\_\_ *per (hour, day, week, etc.)* \_\_\_\_\_
8. **TIME LOST** *due to accident (indicate dates and hours absent):* \_\_\_\_\_  
\_\_\_\_\_
9. **WORK LIMITATIONS** *of employee after return to work:* \_\_\_\_\_  
\_\_\_\_\_
10. **EMPLOYEE PERMANENTLY REPLACED** *because of absence:* Yes \_\_\_\_\_ No \_\_\_\_\_

(COMPANY STAMP)

*Date:* \_\_\_\_\_

*Company:* \_\_\_\_\_

*Signed:* \_\_\_\_\_

*Title:* \_\_\_\_\_

# EGLET PRINCE

4<sup>th</sup> Floor, 400 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101

Telephone: (702) 450-5400  
Facsimile: (702) 450-5451

## RECORDS AUTHORIZATION

### TO WHOM IT MAY CONCERN:

The Undersigned, Wayne Wilson, hereby authorizes and directs all doctors, chiropractors, hospitals, clinics, physical therapy centers, employers, government agencies and all other persons or entities to make available to **EGLET PRINCE**, its assigns or representatives, for examination and/or copying, all records, including billing, relating to the medical condition and treatment and/or employment of the undersigned.

These records include, but are not limited to, copies of diagnoses, physicians notes/orders, records of treatment, reports, charts, police reports, photographs, films, x-rays, MRI's, employment records, personnel files, documents reflecting leaves, absences, terminations or other disciplinary actions and payroll records.

These records are to be used for the evaluation and possible pursuit of a claim for the undersigned. This Authorization is to remain valid until the conclusion of the aforementioned claim.

I understand and acknowledge that information disclosed pursuant to this authorization may be subject to re-disclosure by the recipient, **EGLET PRINCE**, and may no longer be protected by the Health Information Privacy and Accountability Act (HIPAA).

I further fully understand my right to revoke this Authorization, in writing, except to the extent that action has been taken in reliance upon this Authorization.

A photocopy of this Authorization shall be valid.

By presentation of this Authorization, all previous Authorizations are revoked.

This authorization expires on Settlement.

Treatment and payment may not be conditioned on obtaining this authorization.

X

Date 9/19/18

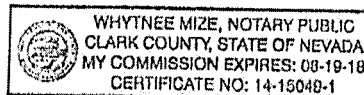
State of Nevada )  
County of Clark )

Subscribed and sworn to before me

Whytnee Mize

Notary Public

My commission expires: \_\_\_\_\_





# Authorization for Release of Protected Health Information (PHI)

Section A: This section must be completed for all Authorizations					
Patient Name: <u>Wayne Wilson</u>		Birth Date: <u>8/11/1968</u>		Social Security No. (optional): <u>566-06-5542</u>	
Provider's/Health Plan's Name: <u>Excalibur-Camelot Steakhouse</u>		Recipient's Name: <u>Eglet Prince</u> <u>Trial Attorneys</u>			
Provider's/Health Plan's Address: <u>3850 Las Vegas Blvd.</u> <u>Las Vegas NV 89109</u>		Address 1: <u>4TH FLOOR, 400 SOUTH 7TH STREET</u>			
		Address 2:			
		City: <u>LAS VEGAS</u>	State: <u>NV</u>	Zip: <u>89101</u>	
This authorization will expire on the following: (Fill in the Date or the Event but not both. If left blank, then this consent will automatically expire one year from the date signed. This consent may be revoked upon request at which time it will no longer serve any other future request. Date: _____ Event: <u>Conclusion of Case</u>					
Description of information to be used or disclosed					
Description:	Date(s):	Description:	Date(s):	Description:	Date(s):
<input type="checkbox"/> All PHI in medical record <input type="checkbox"/> Dictation reports <input type="checkbox"/> Physician orders <input type="checkbox"/> Imaging/Radiology <input type="checkbox"/> Laboratory reports <input type="checkbox"/> Medication Sheets		<input type="checkbox"/> SCAN record <input type="checkbox"/> Cardiac studies <input type="checkbox"/> Progress notes <input type="checkbox"/> Nursing notes <input type="checkbox"/> Transfer forms <input type="checkbox"/> ER Information		<input type="checkbox"/> Abstract: <input checked="" type="checkbox"/> Other: <u>Employment</u> <input type="checkbox"/> Other: <input type="checkbox"/> Itemized Bill:	<u>10/1/17</u> <u>to present</u>
I acknowledge, and hereby consent to such, that the released information may contain alcohol, drug abuse, psychiatric, HIV testing, HIV results, STDs or AIDS information. _____ (Initial). If not applicable please check here <input checked="" type="checkbox"/>					
<p>I understand that: I understand that this executed authorization will release protected and sensitive health information.</p> <p>I may refuse to sign this authorization and that it is strictly voluntary.</p> <p>My treatment, payment, enrollment or eligibility for benefits may not be conditioned on signing this authorization.</p> <p>I may revoke this authorization at any time in writing, but if I do, it will not have any affect on any actions taken prior to receiving the revocation. Further details may be found in the Notice of Privacy Practices.</p> <p>If the requester or receiver is not a health plan or health care provider, the released information may no longer be protected by federal privacy regulations and may be redisclosed.</p> <p>I understand that I may see and obtain a copy the information described on this form, for a reasonable copy fee, if I ask for it.</p> <p>I get a copy of this form after I sign it.</p>					
Section B: Is the request of PHI for the purpose of marketing?					
If yes, the health plan or health care provider must complete Section B, otherwise skip to Section C.					
Will the recipient receive financial or in-kind compensation in exchange for using or disclosing this information?					<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, describe:					
What is the purpose of this use or disclosure? <u>Litigation</u>					
Section C: Signatures					
I have read the above and authorize the disclosure of the protected health information as stated.					
Signature of Patient/Plan Member/Guardian/Patient/Plan Member Representative: <u>[Signature]</u>				Date: <u>9/19/18</u>	
Print Name of Patient/Plan Member's Representative:				Relationship to Patient/Plan Member: <u>Self</u>	